

Message

From: BHAKTA, TINA [AG/1005] [tina.bhakta@monsanto.com]
Sent: 3/14/2018 3:29:34 AM
CC: SEIFERT-HIGGINS, SIMONE [AG/1005] [simone.seifert-higgins@monsanto.com]; Rowland, Grant [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5b004bc79f1f40b0a181a584a8c64495-Rowland, Grant]; MARVIN, THOMAS [AG/1920] [thomas.marvin@monsanto.com]
Subject: Re: Addition of tank mix products to XtendiMax with VaporGrip Technology (EPA Reg. No. 524-617)

This is great news and at least a little win. I was on with valent today so that they will be pleased

Simone and Jerry please touchbase with me prior to informing to hlk in the morning.

Thanks

Tina

Sent from my iPhone

On Mar 13, 2018, at 4:24 PM, Baris, Reuben <Baris.Reuben@epa.gov> wrote:

Hi Simone,
Thanks for the submission, I am acknowledging receipt. Also, thank you for the clarity in your coverletter. I was able to go back through what has already been cleared for synergy concerns, and made the following determination:

Fierce and Fierce XLT may be added to your website as flumioxazin has been cleared for mixes with dicamba. We will conduct the verification search for fluometuron, the a.i. contained in Cotoran 4L.

I hope this helps.
Thank you.
Reuben

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH
U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

From: SEIFERT-HIGGINS, SIMONE [AG/1005] [<mailto:simone.seifert-higgins@monsanto.com>]
Sent: Friday, February 09, 2018 4:42 PM
To: Baris, Reuben <Baris.Reuben@epa.gov>; Rowland, Grant <Rowland.Grant@epa.gov>
Cc: MARVIN, THOMAS [AG/1920] <thomas.marvin@monsanto.com>; BHAKTA, TINA [AG/1005] <tina.bhakta@monsanto.com>
Subject: Addition of tank mix products to XtendiMax with VaporGrip Technology (EPA Reg. No. 524-617)

Dear Mr. Baris,
Please find attached the form 8570-1 form, wind tunnel and modeling report (MSL0029229), and the cover letter notifying the amendment of the XtendiMax URL (xtendimaxapplicationrequirements.com). Monsanto is self-certifying that these changes do not adversely affect spray drift properties of XtendiMax With VaporGrip Technology (EPA Reg. No 524-617). Therefore, and pursuant to Section 6 of the Terms and Conditions, Monsanto intends to proceed with adding the tank mix products in this amendment to www.xtendimaxapplicationrequirements.com.

Please let me know if you have any concerns or questions!

Regards,
Simone

Simone Seifert-Higgins, Ph.D.

*Regulatory Affairs Manager
Monsanto Company
700 Chesterfield Parkway West
Chesterfield, MO 63017
Office: 636-737-9571
Cell: 314-330-3053*

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Message

From: Baris, Reuben [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=A0181E3F02A246FC915A4AF026E249FC-BARIS, REUBEN]
Sent: 3/13/2018 9:23:54 PM
To: SEIFERT-HIGGINS, SIMONE [AG/1005] [simone.seifert-higgins@monsanto.com]; Rowland, Grant [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5b004bc79f1f40b0a181a584a8c64495-Rowland, Grant]
CC: MARVIN, THOMAS [AG/1920] [thomas.marvin@monsanto.com]; BHAKTA, TINA [AG/1005] [tina.bhakta@monsanto.com]
Subject: RE: Addition of tank mix products to XtendiMax with VaporGrip Technology (EPA Reg. No. 524-617)

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I hope this helps.

Thank you.

Reuben

REUBEN BARIS | PRODUCT MANAGER, TEAM 25 | HERBICIDE BRANCH

U.S. ENVIRONMENTAL PROTECTION AGENCY, OFFICE OF PESTICIDE PROGRAMS | (703) 305-7356

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Please let me know if you have any concerns or questions!

Regards,

Simone

Simone Seifert-Higgins, Ph.D.
Regulatory Affairs Manager
Monsanto Company
700 Chesterfield Parkway West
Chesterfield, MO 63017
Office: 636-737-9571
Cell: 314-330-3053

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Message

From: CUBBAGE, JERRY W [AG/1000] [jerry.w.cubbage@monsanto.com]
Sent: 8/17/2016 11:06:52 PM
To: Montague, Kathryn V. [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=c50d485150734f6e85059d64dd80a353-Kathryn V. Montague]
CC: Rowland, Grant [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5b004bc79f1f40b0a181a584a8c64495-Rowland, Grant]; NYANGULU, JAMES M [AG/1920] [james.m.nyangulu@monsanto.com]
Subject: FW: Notification to Registrations (EPA Reg. # 524-616 and 524-617)
Attachments: EPA acknowledgement brand 524-616.pdf; EPA acknowledgement brand 524-617.20141002.pdf

Importance: High

Kay,

Hello, I hope you had a good week out of the office.

I have been working with Grant to understand if the Notifications for EPA Reg. #s 524-616 and 524-617 have been acknowledged and accepted by RD. These Notifications were submitted on June 9, 2016 and we are now at 69 days waiting for the acknowledgement letters.

Additionally in updating the master labels for each registration, I updated the registration numbers from 524-XXX to the products corresponding approved registration numbers, and added the previously approved alternate brand names (see attached acknowledgement letters). It is my understanding that all of these minor updates fall under PR Notice 98-10 as a Notification and should be considered complete after 30 days.

Prior to submission Dan Jenkins had an informal meeting with you showing the minor changes to the warranty statements for each product. Verbally from Dan, it was communicated to me that you thought this would be a prompt action and cause no concern. I am therefore confused by Grant's email below and the concern over the name and the over the top actions.

Please provide an update on the acceptance of these notifications as I would like to move forward with creating final printed labels.

Please let me know if I can help answer any questions or concerns.

Thanks for moving promptly to complete this action.

Jerry

*Jerry W. Cubbage, Ph.D.
Monsanto Company
800 N. Lindbergh Blvd.
C3518N/C3NA
Creve Coeur, MO 63167
Office: 314-694-7350
Cell: 636-236-8894
Email: jerry.w.cubbage@monsanto.com*

From: Rowland, Grant [mailto:Rowland.Grant@epa.gov]
Sent: Tuesday, August 16, 2016 8:46 AM
To: CUBBAGE, JERRY W [AG/1000]

Cc: NYANGULU, JAMES M [AG/1920]

Subject: RE: Notification to Registrations (EPA Reg. # 524-616 and 524-617)

Hello:

I understand that these two notifications are of importance to you, and while I am trying to work through them as quickly as possible, I have been held up by my management while they discuss the accuracy of your requested alternate brand name. I do understand that this name has already been approved, however that decision was made prior to recent concerns regarding the Dicamba/Vapor Grip name and the proposed over-the-top uses.

I should have word from my management by the end of the day today and will immediately let you know what they have decided. Thank you.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: NYANGULU, JAMES M [AG/1920] [<mailto:james.m.nyangulu@monsanto.com>]

Sent: Tuesday, August 16, 2016 8:09 AM

To: Rowland, Grant <Rowland.Grant@epa.gov>

Cc: Montague, Kathryn V. <Montague.Kathryn@epa.gov>

Subject: Notification to Registrations (EPA Reg. # 524-616 and 524-617)

Importance: High

Hi Grant,

I am just following up on your correspondence with Jerry Cubbage with respect to these two registration which required minor amendments.

1. Updating registration number
2. Adding a previously approved brand name
3. Minor change to the warranty language.

According to Jerry, these were expected sometime in July. Kindly let me know the status of these registration amendments.

Thanks again for your help with this.

James Nyangulu

US Agency Regulatory Affairs Manager
202-383-2866 (Office)
202-304-6594 (Cell)

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 31, 2014

Helen E. Mero
Regulatory Affairs Manager
Monsanto Company
1300 I (Eye) Street, NW
Suite 450 East
Washington, DC 20005

Subject: Label Notification per PRN 98-10 – Addition of Alternate Brand Name
Product Name: M1769 Premix Herbicide
EPA Registration Number: 524-616
Application Date: September 25, 2014
Decision Number: 495845

Dear Ms. Mero:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The alternate brand name Roundup Xtend with VaporGrip Technology has been added to the product record.

If you have any questions, you may contact Emily Schmid at 703-347-0189 or via email at schmid.emily@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Emily Schmid for".

Mindy Ondish, Acting Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

October 2, 2014

Helen Mero
Regulatory Affairs Manager
Monsanto Company
1300 I Street, NW, Suite 450 East
Washington, DC 20005

Subject: Notification per PRN 98-10 – Alternate Brand Name
Product Name: M1768 Herbicide
EPA Registration Number: 524-617
Application Date: September 25, 2014
Decision Number: 495977

Dear Ms. Mero:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The alternate brand name "**XtendiMax With VaporGrip Technology**" for this product has been added to our records.

This notification acknowledgement will be uploaded to the Pesticide Product Label System (PPLS) without a label.

If you have any questions, please contact Mindy Ondish at (703)605-0723 or at ondish.mindy@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Mindy Ondish" followed by the word "for" and a small horizontal line.

Kathryn V. Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Message

From: Jeffrey H Birk [jeffrey.birk@basf.com]
Sent: 12/29/2016 4:00:40 PM
To: Rowland, Grant [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5b004bc79f1f40b0a181a584a8c64495-Rowland, Grant]
Subject: RE: Dicamba Inadvertent tolerance petition.

Hello Grant,

For the inadvertent residue tolerances to be useful they need to be established before the dicamba use season and potential overlap with sensitive crop plantings this means that a PRIA date of June would be too late. BASF proposes a new PRIA date of March 31, 2017, which Dan had proposed previously. Please confirm if this would be acceptable.

Thanks,

Jeff

Sent from my Windows Phone

From: Rowland, Grant
Sent: 12/29/2016 10:14 AM
To: Jeffrey H Birk
Subject: Dicamba Inadvertent tolerance petition.

Hello Jeff,

I hope the holidays are treating you well and that you are able to relax a little after Engenia has officially been registered.

And while that action may be out the door, I need to quickly touch bases with you regarding the inadvertent tolerance petition that BASF currently has submitted with the Agency. The PRIA date for this action is today and as I am sure you are aware, the Agency has yet to make a decision regarding the petition. The main reason being that there are still risk assessments and overall implementation strategies that are still under investigation regarding this decision. So with that, the Agency needs more time to develop a programmatic approach to this new issue and since the PRIA expires today, I am writing to see if BASF is willing to renegotiate the date?

To start the discussion, we recommend a 6 month extension but are open to BASFs suggestions as well. If you or someone on your team can get back to me as soon as possible regarding an agreed upon date, I can go ahead and start drafting the paperwork. Thanks Jeff

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

Message

From: CUBBAGE, JERRY W [AG/1005] [jerry.w.cubbage@monsanto.com]
Sent: 1/12/2018 10:18:01 PM
To: Baris, Reuben [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=a0181e3f02a246fc915a4af026e249fc-Baris, Reuben]; Rowland, Grant [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5b004bc79f1f40b0a181a584a8c64495-Rowland, Grant]
CC: BHAKTA, TINA [AG/1005] [tina.bhakta@monsanto.com]; MARVIN, THOMAS [AG/1920] [thomas.marvin@monsanto.com]
Subject: Courtesy copy of the Xtendimax (EPA Reg No 524-617) Annual Herbicide Resistance Management Report per terms and conditions of registration Appendix D
Attachments: 8570-1_Application_HRM_Report_20180112.pdf; Cover letter_M1768_HRM_Report_20180112.pdf; Dicamba COR Report to EPA 1-11-18_signed.pdf

Reuben and Grant,

Hello, Please see attached a courtesy copy of Annual Herbicide Resistance Management Report. This report is a requirement of the conditions of registration for Xtendimax with VaporGrip Technology (M1768 Herbicide, EPA Reg. No. 524-617) Appendix D.


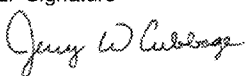
This submission was completed through EPA's electronic submission portal earlier this afternoon.

Have a great weekend.

Cheers,
Jerry

*Jerry W. Cubbage, Ph.D.
Monsanto Company
700 Chesterfield Parkway West
FF4326C
Chesterfield, MO 63017
Office: 636-737-9574
Cell: 636-236-8894
Email: jerry.w.cubbage@monsanto.com*

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 <div style="display: inline-block; text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 </div>		<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
Application for Pesticide – Section I			
1. Company/Product Number Monsanto Company / 524-617		2. EPA Product Manager Reuben Baris	
4. Company/Product (Name) Monsanto Company / M1768 Herbicide (XtendiMax™ with VaporGrip™ Technology)		PM # 25	<input type="checkbox"/> None <input type="checkbox"/> Restricted
5. Name and Address of Applicant (Include ZIP Code) Monsanto Company 1300 I (Eye) Street, NW – Suite 450 East Washington, DC 20005 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	
Section – II			
<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input type="checkbox"/> Notification – Explain below.		<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input checked="" type="checkbox"/> Other – Explain below.	
Explanation: Use additional page(s) if necessary. (For section I and Section II.) Monsanto is the Annual Herbicide Resistance Management Report per terms and conditions of registration Appendix D for Xtendimax with VaporGrip Technology uses on dicamba tolerant soybeans and cotton (EPA Reg. No. 524-617, Decision No. 522837, 516207, and 511766).			
Section – III			
1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No * Certification must be submitted	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. Container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" No. per Package wgt. Container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			
Section – IV			
1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Tom Marvin		Title Director, Federal Regulatory Affairs	Telephone No. (Include Area Code) (202)383-2851
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Regulatory Affairs Manager	
4. Typed Name Jerry W. Cubbage		5. Date January 12, 2018	

MONSANTO



MONSANTO COMPANY
1300 I (Eye) Street, NW
Suite 450 East
Washington, D.C. 20005
<http://www.monsanto.com>

January 12, 2018

Jerry W Cabbage, Ph.D.
Regulatory Affairs Manager
636

Document Processing Desk (E-SUB)
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive, Room S4900
Arlington, VA 22202-4501

Attention: Reuben Baris
PM Team 25

**Subject: Herbicide Resistance Management Report for Xtendimax™ with VaporGrip™ Technology
use on Dicamba-Tolerant Soybeans and Cotton
M1768 Herbicide, EPA Reg. No. 524-617: Decision No. 522837, 516207, and 511766**

Dear Mr. Baris:

Monsanto is submitting its Herbicide Resistance Management Report per the Terms and Condition of Registration Appendix D for Xtendimax with VaporGrip Technology uses on dicamba tolerant soybeans and cotton (EPA Reg. No. 524-617, Decision No. 522837, 516207, and 511766).

This application is being submitted electronically and contains the following documents:

- This cover letter
- Application for Pesticide Registration – EPA Form 8570-1
- Public Data Matrix (8570-35)
- Internal Data Matrix (8570-35)
- Transmittal Document
- Herbicide Resistance Management Report (MRID 50493201)

Should you require any additional information or have any questions regarding this submission, please contact me by direct telephone (636)737-9574, or electronic mail at jerry.w.cabbage@monsanto.com or Tom Marvin at our Washington DC office (202)383-2851.

Sincerely,

Jerry W. Cabbage, Ph.D.
Regulatory Affairs Manager

cc: File copy

ED_002084_00069192-00001

Report Title

Conditions of Registration for M1768 Herbicide: 2018 Report of the 2017 Season

Data Requirement

Conditions of Registration for: M1768 Herbicide
(XtendiMax® with VaporGrip® Technology; EPA Reg. No. 524-617)

Authors

Greg Elmore
Jerry Cabbage
Paula Price
Mark Groth

Report Date

January 11, 2018

Registrant Submitting

Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167

MSL Number

MSL0029165

Submission IDs

CR249-16E2

MRID

50493201

Volume 1 of 1

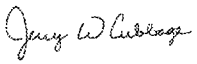
No Claim of Confidentiality

No claim of confidentiality, on any basis whatsoever, is made for any information contained in this document. I acknowledge that information not designated as within the scope of FIFRA sec. 10(d)(1)(A), (B), or (C) and which pertains to a registered or previously registered pesticide is not entitled to confidential treatment and may be released to the public, subject to the provisions regarding disclosure to multinational entities under FIFRA 10(g).

Company: Monsanto Company

Company Agent: Jerry Cabbage

Title: Chemistry Regulatory Affairs Manager

Signature:  Date: January 11, 2018

SUBMISSION AND USE OF MATERIALS UNDER FIFRA

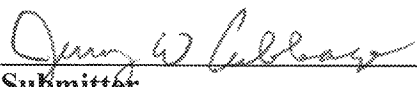
The inclusion of this page is for quality assurance purposes and does not necessarily indicate that this study or document has been submitted to the United States Environmental Protection Agency (U.S. EPA).

The text above applies only to use of the data or document by the U.S. EPA in accordance with the provisions of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and not to any other use or use by any other agency or government.

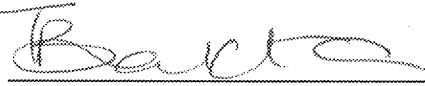
We submit this material to the U.S. EPA specifically under the requirements set forth in FIFRA as amended, and consent to the use and disclosure of this material by EPA strictly in accordance with FIFRA. By submitting this material to EPA in accordance with the method and format requirements contained in PR Notice 2011-3, we reserve and do not waive any rights involving this material, including but not limited to copyright and data compensation, that are or can be claimed by the Company notwithstanding this submission to the U.S. EPA.

Statement of Compliance

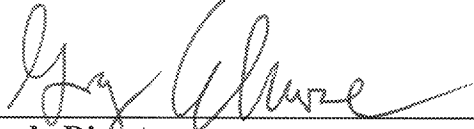
This report does not meet the U.S. EPA Good Laboratory Practice requirements as specified in 40 CFR Part 160. This report summarizes the monitoring program activities as a condition of registration and therefore was not conducted in compliance with the 40 CFR Part 160.



Submitter **Date** 1/11/2018
Jerry Cabbage
Monsanto Company
Chemistry Regulatory Affairs Manager



Sponsor **Date** 1/11/2018
Tina Bhakta
Monsanto Company
Global Chemistry Expansion Lead



Study Director **Date** 1/11/2018
Greg Elmore, Ph.D.
Monsanto Company
North America Technology Development Crop Protection Lead

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Conditions of Registration for M1768 Herbicide: 2018 Report of the 2017 Season

As stated in Appendix D, under D. Reporting Component, as a condition of registration of M1768 Herbicide (XtendiMax® with VaporGrip® Technology), Monsanto is required to provide a report to U.S. EPA that includes:

- a. Annual Sales of M1768 herbicide by state.
- b. For this report, current education program and associated materials.
- c. Summary of Monsanto's efforts aimed at achieving implementation of Best Management Practices (BMP's).
- d. Summary of the determinations as to whether any reported lack of herbicide efficacy was "likely resistance", any follow-up actions taken, and, if available, the ultimate outcome (e.g., evaluation of success of additional weed control measures) regarding each case of "likely resistance"; with cases of likely resistance by county and state.
- e. Results of the annual survey including whether growers are implementing herbicide resistance BMPs and a summary of Monsanto's annual review and possible modification based on that survey of the education program and response to likely resistance.
- f. Summary of the status of any laboratory and greenhouse testing performed as a follow up on incidents of likely resistance.

Annual Sales of M1768 by state

Table 1 provides the 2017 growing season sales of M1768 for each state.

Current Education Program

On February 9, 2017 Monsanto submitted a report to U.S. EPA that included the educational plan approach, elements of the plan and example materials (Horak et.al., 2017). The submitted plan reflects the current education program that was implemented in 2017. Briefly, as indicated in the submitted plan, education on weed resistance and best management practices (BMPs) was communicated through the Roundup Ready PLUS® program and website, the herbicide label, and the Technology Use Guide. In addition, weed resistance management educational materials were available through 3rd party organizations and efforts such as the Weed Science Society of America (WSSA), United Soybean Board's "Take Action" initiatives, and the Global Herbicide Resistance Action Committee (HRAC) and through multimedia campaigns. Training was made available and or provided to famers and or applicators through the programs currently in place such as the RoundupReady® Xtend Crop System website, Pesticide Applicator Education programs, and through trade shows.

Changes in the education program for 2018 will reflect the reclassification of M1768 as a Restricted Use Pesticide for retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified

Applicator's certification, including the requirement to complete mandatory dicamba or auxin-specific training and record keeping prior to applying this product in 2018.

Implementation of Best Management Practices (BMP's)

Best management practices, education and expert recommendations for weed resistance management in the RoundupReady® Xtend Crop System were actively communicated to growers through multiple venues including RoundupReadyXtend.com and RoundupReadyPLUS.com. These sites provide expert weed scientist recommendations for proven weed management solutions by crop and region, incentives for using endorsed herbicides with multiple, effective sites of action, and up-to-date information on important agronomic topics. Monsanto also actively promoted external herbicide resistance management resources and education, including Take Action (iwilltakeaction.com), in training and educational materials. Annual grower and custom applicator training materials incorporated BMP's as well as the recommendation that a grower scout fields after application to detect weed escapes or shifts in weed species, and report any incidence of non-performance of XtendiMax® with VaporGrip® Technology against a particular weed species through their Monsanto retailer or representative, or by calling 1- 844- RRXTEND. If resistance was suspected, the grower was instructed to treat weed escapes with an herbicide having a site of action other than Group 4 and/or use non-chemical methods to remove escapes, as practical, with the goal of preventing further seed production.

Lack of Herbicide Efficacy and "Likely Resistance"

A process was established to investigate and follow up on grower reports of lack of M1768 efficacy. Following the process, there was a single grower with five fields who reported a lack of M1768 efficacy to Palmer Pigweed (*Amaranthus palmeri*) from which samples were collected. See Table 2 for the county and state where these reports originated. Soil samples were collected from these fields and weed control recommendations were made and implemented for each of the five fields. Weeds were effectively controlled in each field by season's end. The collected soil was tested and for the samples that germinated none of the weeds exhibited the signs of being likely resistant (Table 2) based on the criteria in Norsworthy et al. (2012).

Annual Survey Results

Monsanto conducted a phone survey of farmers who planted 50+ acres of Roundup Ready 2 Xtend® soybeans and or XtendFlex® cotton in 2017 and who had applied XtendiMax® with VaporGrip® Technology over the top to at least some of the acres. The survey was conducted in representative growing areas across the states where the product was approved.

Of the 459 that responded, approximately 65% of growers were self-applying XtendiMax[®] with VaporGrip[®] Technology at the labeled rate for maximum weed control (22 fl oz/acre) and were mixing with herbicides with unique sites of action. Growers reported scouting for weed pressure before applications and monitoring weed control and escapes after applications in >85% of the cases for both soybean and cotton. Ninety- seven percent of soybean growers and 94% of cotton growers reported that they were satisfied with the weed control provided by XtendiMax[®] with VaporGrip[®] Technology.

In addition to the U.S. EPA label for XtendiMax[®] with VaporGrip[®] Technology, growers reported that they obtained additional XtendiMax[®] with VaporGrip[®] Technology information from their dealer/retailer, roundupreadyxtend.com, Monsanto representatives and University/Extension representatives.

Based on the amended U.S. EPA master label (EPA Reg No. 524-617; stamped October 12, 2017), XtendiMax[®] with VaporGrip[®] Technology was classified as a Restricted Use Pesticide for retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification, including a requirement to complete mandatory dicamba or auxin-specific training required and record keeping, prior to applying this product in the 2018 growing season and each growing season thereafter. For the upcoming 2018 growing season, Monsanto's training materials have been revised to satisfy the amended label requirements as well as build on the learnings from the 2017 growing season and grower survey (e.g. addressing key label requirements throughout the training materials).

Testing of Incidents of “Likely Resistance”

As mentioned above, there was a single grower with five fields who reported a lack of M1768 efficacy to Palmer Pigweed (*Amaranthus palmeri*), in 2017, for which samples were collected. Soil samples from the five fields were collected and tested in the greenhouse at the Monsanto Chesterfield, MO location. Four of the five samples germinated and after emergence, weeds were sprayed with M1768 and none of the weeds exhibited the signs of being likely resistant based on the criteria in Norsworthy et al. (2012) (Table 2).

References:

Horak, M., Burchette, S., Starke, M., Elmore, G., 2017. M1768 Herbicide. Herbicide Resistance Management Plan Educational/Informational Component. Educational.Plan.Submission.20170209 (Monsanto tracking ID CDX_2017_000889).

Norsworthy, J.K., Ward, S.M., Shaw, D.R., Llewellyn, R.S., Nichols, R.L., Webster, T.M., Bradley, K.W., Frisvold, G., Powles, S.B., Burgos, N.R., Witt, W.W., Barrett, M., 2012, Reducing the Risks of Herbicide Resistance: Best Management Practices and Recommendations. Weed Science 2012 Special Issue:31-62.

Tables

Table 1. 2017 Growing Season Sales of M1768 by State

State	Pounds of M1768
AL	142,477
AR ¹	92,527
AZ	8,902
DE	1,047
GA	436,594
IA	778,126
IL	1,181,347
IN	308,069
KS	515,204
KY	111,662
LA	10,443
MD	16,494
MI	39,219
MN	585,332
MO	770,257
MS	250,319
NC	164,053
ND	476,294
NE	334,346
NY	5,673
OH	168,504
OK	248,146
PA	7,331
SC	160,417
SD	587,825
TN	201,361
TX	1,385,488
VA	2,865
WI	23,447

¹Dicamba went to a distribution center but was not sold in this state.

Table 2. Summary of Cases of Likely Resistance in 2017

ID	State	County	Sample Type Collected	Weed Species Tested	Likely Resistance¹ (Y/N)
2017-07-001	Missouri	Dunklin	Dry Soil	Palmer Pigweed (<i>Amaranthus palmeri</i>)	N
2017-07-002					N
2017-07-003					N
2017-07-004					*
2017-07-005					N

¹ Based on the criteria set in forth in Norsworthy, et al 2012

*Seed did not germinate from this sample and therefore, was not sprayed.

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 9/20/2017 5:02:58 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Two Engenia herbicide follow-up requests
Attachments: Labeling - - BASF.DOCX

Jeff,

Thanks for reaching out. I spoke with Reuben and Kay and it appears that Max was sent a hard (or electronic copy) of the main label changes for the 2018 season. In case he has not been able to get them to you, I have attached an identical copy of the document to this e-mail. Please let me know immediately if you have any questions, concerns or need any clarification.

As for the Dicamba DERs I will send you what I have by the end of the day and try to get you the rest by the end of next week.

I will also look into the remaining A.I.s on your synergy list and get back to you as well.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Wednesday, September 20, 2017 9:29 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: Two Engenia herbicide follow-up requests

Hello Grant,

I have not had the chance to discuss the details with Max, but I understand that we have decided on the necessary Engenia herbicide label changes for the 2018 season. Once I have those details, I'll get the changes made to the labeling and get that to you for review as soon as possible.

As follow-up:

Have you had a chance to collect all of the DERs for Engenia? I know that you were working on it, but you did not have all of them that last time that I checked. Even if you don't have all of them, I would appreciate it if you could send me what you do have available.

Can you please check on the herbicide synergy clearance request that BASF made back on March 8, 2017 for the following herbicides?

Dimethenamid
Imazamox
Metolachlor
Saflufenacil
Thifensulfuron

Glufosinate
Imazethapyr
Pyroxasulfone

My understand is that the synergy patent search results that BASF submitted were under review earlier this year, but to date we have not received a final decision. I ask because we are planning for next year and don't want to create confusion for the grower by making last minute changes to the approve tank mixture listings as we go into the planning stage for next year. Also BASF is completing synergy patent search reviews for an additional 16 active ingredients that I will be submitting in the next couple of weeks.

Thanks, and I look forward to hearing back from you.

Jeff

I. Proposed Voluntary RUP Classification and Label-based Training and Record Keeping:

A. Voluntary RUP Classification: "Restricted Use Pesticide; For Retail Sale To and Use Only by Certified Applicators; Only for those uses covered by Certified Applicators certification. Only certified applicators may apply this product-those acting under the supervision of a certified applicator cannot apply this product. "

B. Record keeping (Note, the expectation is that this will be a heading within the Directions for Use). "Required recordkeeping for applications of this product. You must keep the following records for a period of two years; records must be generated within 14 days of application and a record must be kept for every day of application. Records must be made available to State Pesticide Control Official(s), USDA, and EPA upon request. All records required by the Federal Pesticide Recordkeeping Program, 7 CFR Part 110."

1. The brand or product name (& EPA Registration Number)
2. The EPA registration number
3. The total amount applied
4. The month, day, and year
5. The location of the application
6. The crop, commodity, stored product, or site
7. The size of area treated
8. The name of the certified applicator
9. The certification number of the certified applicator
10. Training: Proof that you completed training as required by Section [X] of this product label.
11. Application Timing: whether you applied this product pre-emergence or, the number of days after planting if you applied this product post-emergence.
12. Receipts of purchase: receipts for the purchase of this product.
13. Product Label: a copy of this product labels, and any state special local needs label that supplements this label.
14. Sensitive Crops Awareness: Document that you checked an applicable sensitive crop registry; or document that you surveyed neighboring fields for any sensitive areas or susceptible crops prior to application. At a minimum, records must include the date you consulted the specialty crop registry or surveyed neighboring fields, and the name of the specialty crop registry you consulted.
15. Spray System Cleanout: Document that you complied with the section of this label titled: "Proper spray system equipment cleanout. At a minimum, records must include the date you performed the required cleanout, and method you of cleanout you followed.
16. Tank Mix Products: a list of which all products (pesticides, adjuvants, and other products) that you tank mixed with this product for each

application. Include EPA registration numbers in the case of any pesticides.

17. Start and Finish Times: the time you begin and the time you complete applications of this product.
18. Nozzle Selection: which spray nozzle you used to apply this product, and the nozzle pressure you set your sprayer to.
19. Air Temperature: the air temperature at boom height at the time you start and finish applications of this product.
20. Wind Speed and Direction: the wind speed at boom height at the time you start and finish applications of this product, and the wind direction at the time you start applications of this product.

- II. Training Requirement: (Note this will be a separate heading "Training") "Prior to applying this product in the 2018 growing season, you must complete dicamba or auxin-specific training. If training is available and required by the state where you intend to apply this product, you must complete that training before applying this product in-crop. If your state does not require auxin or dicamba-specific training, then you must complete dicamba or auxin-specific training provided by one of the following sources: a) a registrant of a dicamba product approved in-crop use with dicamba-tolerant crops, or b) a state or state-authorized provider."

Deliberative Process / Ex. 5

- III. Wind Speed:

Language: "Do not apply at wind speeds (at boom height) greater than 10 mph or less than 3 mph."

- IV. Tank Cleanout:

- A. Language: "(Residues warning). You must ensure that the spray system used to apply this product is clean before using this product."
- B. Note that there is a link to a reporting element here: You must document that you complied with the section of this label titled: "Proper spray system equipment cleanout," per above.

Deliberative Process / Ex. 5

- V. Susceptible Crops:

- A. Language: Add additional sensitive crops from WSSA List.
- B. Proposed Records: Document that you checked an applicable sensitive crop registry; or document that you surveyed neighboring fields for any sensitive areas or susceptible crops prior to application, per above.

Deliberative Process / Ex. 5

- VI. Temperature Inversion/timing of application:

- A. Language: "Do not apply between sunset and sunrise."

- VII. Tractor Speed:

- A. Proposed Language—Recommend 5 mph at field edges.

Label Language for BASF amendments to Engenia Registration

NOTE: Continue work on implementation and conflicts with 2017 labeling.

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 11/17/2017 3:19:37 PM
To: CUBBAGE, JERRY W [AG/1000] [jerry.w.cubbage@monsanto.com]; BHAKTA, TINA [AG/1000] [tina.bhakta@monsanto.com]
Subject: Dicamba new salt formulation: Missing humidone study

Hello:

The Agency is currently reviewing the new dicamba salt data waivers that were submitted by your company. While doing so, the reviewer noticed that the data waiver for the field volatility study (MRIS 50290409) references a humidome study conducted on the new salt (M1832), showing the air concentrations are lower than those for M1691. However, we could not find the humidome study listed as one of the new studies with that submission. If you could, please help us track down the whereabouts of this study in order for our science reviewer to continue with their review. Thank you.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 12/29/2016 4:03:12 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Dicamba Inadvertent tolerance petition.

Jeff,

That makes complete and practical sense. **March 31, 2017** is acceptable. Thank you for the quick response.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Thursday, December 29, 2016 11:01 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba Inadvertent tolerance petition.

Hello Grant,

For the inadvertent residue tolerances to be useful they need to be established before the dicamba use season and potential overlap with sensitive crop plantings this means that a PRIA date of June would be too late. BASF proposes a new PRIA date of March 31, 2017, which Dan had proposed previously. Please confirm if this would be acceptable.

Thanks,

Jeff

Sent from my Windows Phone

From: Rowland, Grant
Sent: 12/29/2016 10:14 AM
To: [Jeffrey H Birk](mailto:jeffrey.birk@basf.com)
Subject: Dicamba Inadvertent tolerance petition.

Hello Jeff,

I hope the holidays are treating you well and that you are able to relax a little after Engenia has officially been registered.

And while that action may be out the door, I need to quickly touch bases with you regarding the inadvertent tolerance petition that BASF currently has submitted with the Agency. The PRIA date for this action is today and as I am sure you are aware, the Agency has yet to make a decision regarding the petition. The main reason being that there are still risk assessments and overall implementation strategies that are still under investigation regarding this decision. So

with that, the Agency needs more time to develop a programmatic approach to this new issue and since the PRIA expires today, I am writing to see if BASF is willing to renegotiate the date?

To start the discussion, we recommend a 6 month extension but are open to BASFs suggestions as well. If you or someone on your team can get back to me as soon as possible regarding an agreed upon date, I can go ahead and start drafting the paperwork. Thanks Jeff

-Grant

*Grant Rowland
Herbicide Branch
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703-347-0254*

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 12/29/2016 3:14:13 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: Dicamba Inadvertent tolerance petition.

Importance: High

Hello Jeff,

I hope the holidays are treating you well and that you are able to relax a little after Engenia has officially been registered.

And while that action may be out the door, I need to quickly touch bases with you regarding the inadvertent tolerance petition that BASF currently has submitted with the Agency. The PRIA date for this action is today and as I am sure you are aware, the Agency has yet to make a decision regarding the petition. The main reason being that there are still risk assessments and overall implementation strategies that are still under investigation regarding this decision. So with that, the Agency needs more time to develop a programmatic approach to this new issue and since the PRIA expires today, I am writing to see if BASF is willing to renegotiate the date?

To start the discussion, we recommend a 6 month extension but are open to BASFs suggestions as well. If you or someone on your team can get back to me as soon as possible regarding an agreed upon date, I can go ahead and start drafting the paperwork. Thanks Jeff

-Grant

*Grant Rowland
Herbicide Branch
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703-347-0254*

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 11/16/2016 2:57:44 PM
To: BHAKTA, TINA [AG/1000] [tina.bhakta@monsanto.com]
Subject: Dicamba question

Tina,
Which document are you referring to when you say the tank mix-protocol? The Final Decision that discusses Tank-mixing? The terms of registration? The Volatility document? Or are you referring to a document that was posted when the decision was proposed?

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 10/19/2016 1:56:36 PM
To: NYANGULU, JAMES M [AG/1920] [james.m.nyangulu@monsanto.com]
Subject: Product Name Question

Hello James.

As I work on finishing up the Final Decision for the new Dicamba uses, I had a question for you. Currently the primary name for the vaporgrip product is M1768. Because it is the primary name, that is the name we have to use throughout our Final Decision Document when referencing the vaporgrip formulation. My question is, is that ok with Monsanto? Or would you like us to be using "Xtendimax W/Vaporgrip technology" when referencing the new product within our Final Decision.

If so, you will have to submit to the Agency a notification (with all the necessary paperwork) requesting that we change the Alternate Brand name to the Primary Brand name, and vice versa. Please let me know your thoughts as soon as possible. Thank you.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 11/8/2016 5:11:10 AM
To: CUBBAGE, JERRY W [AG/1000] [jerry.w.cubbage@monsanto.com]
Subject: RE: Dicamba buffer question.
Attachments: Xtendimax_DT_COTTON_110316_v1.pdf; Xtendimax_DT_Soybean_110316_v1.pdf

Hi Jerry,

My apologies for such the late e-mail. Here are the edits we spoke of earlier. Hopefully this will be it and we can get these labels finalized Tuesday for a Wednesday signing off of. Feel free to call me with any questions you may have.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: CUBBAGE, JERRY W [AG/1000] [mailto:jerry.w.cubbage@monsanto.com]
Sent: Monday, November 07, 2016 6:38 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: Re: Dicamba buffer question.

Grant

Thanks I look forward to seeing the labels and getting them finalized.

Jerry

Sent from my iPhone

On Nov 7, 2016, at 4:39 PM, Rowland, Grant <Rowland.Grant@epa.gov> wrote:

Jerry,

We like that and agree with you replacing "they" with "the areas listed below" If you could, please match the appropriate section in your labels with the following language that will be written in our Final Decision document. I'll also be sending a follow up e-mail shortly with a few label comments attached so please hold off on sending me anything until you receive that as well.

Protection of Sensitive Areas:

Maintain a 110 foot downwind buffer (when applying 22 fluid ounces of this product per acre) or a 220 foot downwind buffer (when applying 44 fluid ounces of this product per acre) between the last treated row and the closest downwind edge (in the direction in

which the wind is blowing). If any of the following areas below are directly adjacent to the treated field, the areas listed below can be considered part of the buffer distance.

To maintain this required buffer zone:

- No application swath can be initiated in, or into an area that is within the applicable buffer distance.

The following areas may be included in the buffer distance calculation when adjacent to field edges:

- Roads, paved or gravel surfaces,
- Planted agricultural fields containing: corn, dicamba tolerant cotton, dicamba tolerant soybean, sorghum, proso millet, small grains and sugarcane. If the applicator intends to include such crops as dicamba tolerant cotton and/or dicamba tolerant soybeans in the buffer distance calculation, the applicator must confirm the crops are in fact dicamba tolerant and not conventional cotton and/or soybeans.
- Agricultural fields that have been prepared for planting.
- Areas covered by the footprint of a building, silo, or other man made structure with walls and or roof.

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: CUBBAGE, JERRY W [AG/1000] [<mailto:jerry.w.cubbage@monsanto.com>]
Sent: Monday, November 07, 2016 2:45 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba buffer question.

Hello Grant,

Thanks for the update. I like making the label easier to read. I am okay with your version with the following modification.

Maintain a 110 foot downwind buffer (when applying 22 fluid ounces of this product per acre) or a 220 foot downwind buffer (when applying 44 fluid ounces of this product per acre) between the last treated row and the closest downwind edge (in the direction in which the wind is blowing). If any of the following areas below are directly adjacent to the treated field, ~~they~~ the areas listed below can be considered part of the buffer distance.

Let me know if you are okay replacing the “they” with “the areas listed below”

Cheers,

Jerry

From: Rowland, Grant [<mailto:Rowland.Grant@epa.gov>]
Sent: Monday, November 07, 2016 12:32 PM

To: CUBBAGE, JERRY W [AG/1000] <jerry.w.cubbage@monsanto.com>

Subject: Dicamba buffer question.

Hi Jerry,

We are finishing up the label review and some people in the head office have brought to our attention that the buffer language on the label (see below) is a bit difficult to understand. Specifically the highlighted part.

I thought I would reach out to you to see if you had any suggestions for cleaning it up a little. To give you a better idea of what we were thinking, the second paragraph is something Dan Kenny and I drafted up. It doesn't have to be exactly this, just letting you know where our thoughts are at. Please let us know what you think, and any other options you may have as soon as you can.

Current

"Maintain a 110 foot downwind buffer (when applying 22 fluid ounces of this product per acre) or a 220 foot downwind buffer (when applying 44 fluid ounces of this product per acre) between the last treated row and the closest downwind edge (in the direction in which the wind is blowing) of any area less the distance of any of the adjacent areas specified below."

VS.

Maintain a 110 foot downwind buffer (when applying 22 fluid ounces of this product per acre) or a 220 foot downwind buffer (when applying 44 fluid ounces of this product per acre) between the last treated row and the closest downwind edge (in the direction in which the wind is blowing). If any of the following areas below are directly adjacent to the treated field, they can be considered part of the buffer distance.

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

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SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

When using XtendiMax™ With VaporGrip™ Technology as permitted according to this supplemental labeling, read and follow all applicable directions, restrictions, and precautions on the container label and booklet provided with the product container and on this supplemental labeling. This supplemental labeling must be in the possession of the user at the time of pesticide application.

This supplemental label expires on 11/xx/2018 and must not be used or distributed after this date.

XtendiMax™ With VaporGrip™ Technology

EPA Reg. No. 524-617

GROUP	4	HERBICIDE
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FOR PREEMERGENCE AND POSTEMERGENCE USE ON BOLLGARD II® XTENDFLEX® COTTON

Keep out of reach of children

CAUTION!

In case of an emergency involving this product, call collect, day or night, 314-694-4000.

Bollgard II®, Roundup Ready®, Roundup Ready 2 Xtend®, XtendiMax™, XtendFlex®, and VaporGrip™ are trademarks of Monsanto Technology LLC. All other trademarks are the property of their respective owners.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

This labeling must be in the possession of the user at the time of herbicide application.

BOLLGARD II® XTENDFLEX® COTTON CONTAINS A PATENTED GENE THAT PROVIDES TOLERANCE TO DICAMBA, THE ACTIVE INGREDIENT IN THIS PRODUCT. THIS PRODUCT WILL CAUSE SEVERE CROP INJURY OR DESTRUCTION AND YIELD LOSS IF APPLIED TO COTTON THAT IS NOT DICAMBA TOLERANT, INCLUDING COTTON WITH A TRAIT ENGINEERED TO CONFER TOLERANCE TO AUXIN HERBICIDES OTHER THAN DICAMBA. FOLLOW THE REQUIREMENTS SET FORTH HEREIN TO PREVENT SEVERE CROP INJURY OR DESTRUCTION AND YIELD LOSS. CONTACT WITH FOLIAGE, GREEN STEMS, OR FRUIT OF CROPS, OR ANY DESIRABLE PLANTS THAT DO NOT CONTAIN A DICAMBA TOLERANCE GENE OR ARE NOT NATURALLY TOLERANT TO DICAMBA, COULD RESULT IN SEVERE PLANT INJURY OR DESTRUCTION.

Information on Bollgard II® XtendFlex® Cotton can be obtained from your seed supplier or Monsanto representative. Bollgard II® XtendFlex® Cotton must be purchased from an authorized licensed seed supplier.

The instructions contained in this Monsanto Supplemental Label include all applications of XtendiMax™ With VaporGrip™ Technology that may be made to Bollgard II® XtendFlex® Cotton during the cropping season. DO NOT combine these instructions with other instructions in the "COTTON" Section of any other XtendiMax™ With VaporGrip™ Technology label for use over crops that do not contain the dicamba tolerance trait.

Note: Bollgard II® XtendFlex® Cotton and methods of controlling weeds and applying dicamba in a Bollgard II® XtendFlex® Cotton crop are protected under U.S. patent law. A license to use Bollgard II® XtendFlex® Cotton seed must be obtained prior to use. No license to use Bollgard II® XtendFlex® Cotton is granted or implied with the purchase of this herbicide product. Bollgard II® XtendFlex® Cotton is owned by Monsanto and a license must be obtained from Monsanto before using it. Contact your Authorized Monsanto Retailer for information on obtaining a license to Bollgard II® XtendFlex® Cotton.

See the "PRODUCT INFORMATION" and "APPLICATION EQUIPMENT AND TECHNIQUES" sections of the XtendiMax™ With VaporGrip™ Technology product label for important use information. In the event that there are any inconsistencies with the directions for use between this supplemental label and any other labeling for this product, follow the directions for use on this supplemental label.

Training and education on proper pesticide application is encouraged. Applicators should visit www.xtendimaxapplicationrequirements.com for training information and opportunities relevant to this product.

TYPES OF APPLICATIONS: Preplant; At-Planting; Preemergence; Postemergence (In-crop)

XtendiMax™ With VaporGrip™ Technology is approved by U.S. EPA to be used in the following states, subject to county restriction as noted: Alabama, Arkansas, Arizona, Colorado, Delaware, Florida (excluding Palm Beach County), Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oklahoma, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee (excluding Wilson County), Texas, Virginia, West Virginia, Wisconsin.

Restrictions

- Do not apply this product aurally.
- Do not make application of this product if rain is expected in the next 24 hours.

USE INSTRUCTIONS

Apply this product in a minimum of 10 gallons of spray solution per acre as a broadcast application. For best performance, control weeds early when they are less than 4 inches. Timely application will improve control and reduce weed competition. Refer to the following table for maximum application rates of this product with Bollgard II® XtendFlex® Cotton.

Maximum Application Rates	
Combined total per year for all applications	88 fluid ounces per acre (2.0 lb. a.e. dicamba per acre)
Total of all Preplant, At-Planting, and Preemergence applications	44 fluid ounces per acre (1.0 lb. a.e. dicamba per acre)
Total of all In-crop applications from emergence up to 7 days pre-harvest	88 fluid ounces per acre (2.0 lb. a.e. dicamba per acre)
Maximum In-crop, single application	22 fluid ounces per acre (0.5 lb. a.e. dicamba per acre)

a.e. – acid equivalent

Refer to Table 1 of the XtendiMax™ With VaporGrip™ Technology label booklet for application rates for weed type and growth stage controlled by this product. Maximum in-crop application rate should be used when treating tough to control weeds, dense vegetative growth or weeds with a well-established root system.

Preplant, At-Planting, Preemergence

USE INSTRUCTIONS: This product may be used to control broadleaf weeds and may be applied before, during or immediately after planting Bollgard II® XtendFlex® Cotton. Refer to the “WEEDS CONTROLLED” section of the label booklet for XtendiMax™ With VaporGrip™ Technology for specific weeds controlled.

RESTRICTIONS: The maximum combined quantity of this product that may be applied for all preplant, at-planting, and preemergence applications is 44 fluid ounces (1.0 lb a.e. dicamba) per acre per season. The maximum application rate for a single, preplant, at-planting, or preemergence application must not exceed 44 fluid ounces (1.0 lb a.e. dicamba) per acre. Do not apply less than 22 fluid ounces (0.5 lb a.e. dicamba) per acre.

Postemergence (In-crop)

USE INSTRUCTIONS: This product may be used to control broadleaf weeds in Bollgard II® XtendFlex® Cotton. In-crop applications of this product can be made from emergence up to 7 days prior to harvest. The maximum and minimum rate for any single, in-crop application is 22 fluid ounces (0.5 lb a.e. dicamba) per acre. Using the appropriate application rate may reduce the selection for resistant weeds. For best performance, control weeds early when they are less than 4 inches. Monsanto Company does not warrant product performance of applications to

labeled weeds greater than 4 inches in height. Sequential applications of this product may be necessary to control new flushes of weeds or on tough-to-control weeds. Allow at least 7 days between applications. A pre-harvest application of this product may be made up to 7 days before harvest.

Postemergence applications of this product mixed with adjuvants may cause a leaf response to Bollgard II® XtendFlex® Cotton. The symptoms usually appear as necrotic spots on fully expanded leaves. To reduce the incidence and severity of the necrosis, consider increasing the spray volume to 15 GPA or greater and lower adjuvant rates. EC-based products that are tank mixed with products containing dicamba may increase the severity of the leaf damage.

RESTRICTIONS:

- The combined total applied from crop emergence up to 7 days prior to harvest must not exceed 88 fluid ounces (2.0 lb a.e. dicamba) per acre.
- The maximum single, in-crop application rate must not exceed 22 fluid ounces (0.5 lb a.e. dicamba).
- The combined total per year for all applications must not exceed 88 fluid ounces (2.0 lb a.e. dicamba) per acre. For example, if a preplant application of 44 fluid ounces (1.0 lb a.e. dicamba) per acre was made, then the combined total in-crop applications must not exceed 44 fluid ounces (1.0 lb a.e. dicamba) per acre.
- Allow at least 7 days between applications and allow at least 7 days between final application and harvest or feeding of cottonseed and cotton gin by-products.

TANK-MIXING INSTRUCTIONS

XtendiMax™ With VaporGrip™ Technology may only be tank-mixed with products that have been tested and found not to adversely affect the offsite movement potential of XtendiMax™ With VaporGrip™ Technology. A list of those products may be found at www.xtendimaxapplicationrequirements.com. DO NOT tank mix any product with XtendiMax™ With VaporGrip™ Technology unless:

1. You check the list of tested products found not to adversely affect the offsite movement potential of XtendiMax™ With VaporGrip™ Technology at www.xtendimaxapplicationrequirements.com no more than 7 days before applying XtendiMax™ With VaporGrip™ Technology; and
2. The intended tank-mix product is identified on the list of tested products are identified; and
3. The intended products are not prohibited on either this supplemental label or the label of the tank mix product.

4. Additional Warnings and Restrictions:

- Some COC, HSOC and MSO adjuvants may cause a temporary crop response.
- Do not tank mix products containing ammonium salts such as ammonium sulfate and urea ammonium nitrate.
- Drift reduction agents (DRAs) can minimize the percentage of driftable fines. However, the applicator must check [INSERT URL] to determine if the DRA is listed and check with the DRA manufacturer to determine if the DRAs will work effectively with the approved spray nozzle, spray pressure, and the desired spray solution.

MONSANTO MAKES NO RECOMMENDATION OR WARRANTY HEREIN REGARDING THE USE OF ANY PRODUCT THAT MAY APPEAR ON THE WEBSITE REFERENCED ABOVE, REGARDLESS OF WHETHER SUCH PRODUCT IS USED USED TO THE EXTEND CONSISTENT WITH APPLICABLE LAW ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. BUYER AND ALL USERS ARE SOLELY RESPONSIBLE FOR ANY LACK OF PERFORMANCE, LOSS, OR DAMAGE IN CONNECTION WITH THE USE OR HANDLING OF ANY SUCH PRODUCT ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. See the section titled "LIMIT OF WARRANTY AND LIABILITY" herein for more information.

WEED RESISTANCE MANAGEMENT

Some naturally occurring weed biotypes that are tolerant (resistant) to dicamba may exist due to genetic variability in a weed population. Where resistant biotypes exist, the repeated use of herbicides with the same sites of action can lead to the selection for resistant weeds. Certain agronomic practices can delay or reduce the likelihood that resistant weed populations will develop and can be utilized to manage weed resistance once it occurs.

Do not use less than 22 fluid ounces per acre (0.5 lb a.e./A) of this product in a single application. Using the appropriate application rate can minimize the selection for resistant weeds.

Proactively implementing diversified weed control strategies to minimize selection for weed populations resistant to one or more herbicides is a best practice. A diversified weed management program may include the use of multiple herbicides with different sites of action and overlapping weed spectrum with or without tillage operations and/or other cultural practices. Research has demonstrated that using the labeled rate and directions for use is important to delay the selection for resistance.

The continued effectiveness of this product depends on the successful management of the weed resistance program; therefore, it is very important to perform the following actions.

To aid in the prevention of developing weeds resistant to this product, the following steps should be followed where practical:

- Scout fields before application to ensure herbicides and rates will be appropriate for the weed species and weed sizes present.
- Apply full rates of XtendiMax™ With VaporGrip™ Technology for the most difficult to control weed in the field at the specified time (correct weed size) to minimize weed escapes.
- Scout fields after application to detect weed escapes or shifts in weed species.
- Report any incidence of non-performance of this product against a particular weed species to your Monsanto retailer, representative or call [INSERT PHONE NUMBER]
- If resistance is suspected, treat weed escapes with an herbicide having a site of action other than Group 4 and/or use non-chemical methods to remove escapes, as practical, with the goal of preventing further seed production.

Additionally, users should follow as many of the following herbicide resistance management practices as is practical:

- Use a broad spectrum soil-applied herbicide with other sites of action as a foundation in a weed control program.
- Utilize sequential applications of herbicides with alternative sites of action.
- Rotate the use of this product with non-Group 4 herbicides.
- Avoid making more than two applications of dicamba and any other Group 4 herbicides within a single growing season unless mixed with another mechanism of action with an overlapping spectrum for the difficult to control weeds.
- Incorporate non-chemical weed control practices, such as mechanical cultivation, crop rotation, cover crops and weed-free crop seeds, as part of an integrated weed control program.
- Thoroughly clean plant residues from equipment before leaving fields suspected to contain resistant weeds.
- Manage weeds in and around fields, during and after harvest to reduce weed seed production.

Contact the local agricultural extension service, Monsanto representative, agricultural retailer or crop consultant for further guidance on weed control practices as needed.

APPLICATION EQUIPMENT AND TECHNIQUES

DO NOT APPLY THIS PRODUCT TO BOLLGARD II® XTENDFLEX® COTTON USING AERIAL SPRAY EQUIPMENT.

Apply this product using properly maintained and calibrated equipment capable of delivering the desired volumes.

SPRAY DRIFT MANAGEMENT

Do not allow herbicide solution to mist, drip, drift or splash onto desirable vegetation because severe injury or destruction to desirable broadleaf plants could result. The following drift management requirements must be followed.

Controlling Droplet Size

Off-target movement potential may be reduced by applying large droplets that provide sufficient coverage and control. Applying larger droplets can reduce drift potential, but will not prevent off-target movement if the application is made improperly, or under unfavorable environmental conditions (see the “**Wind Speed and Direction**”, “**Temperature and Humidity**” and “**Temperature Inversions**” sections of this label).

- **Nozzle type.** Use only Tee Jet® TT11004 nozzle with a maximum operating pressure of 63 psi when applying XtendiMax™ With VaporGrip™ Technology or any other approved nozzle found at www.xtendimaxapplicationrequirements.com. Do not use any other nozzle and pressure combination not specifically listed on this website.
- **Hooded Sprayers.** Using a hooded sprayer in combination with approved nozzles may further reduce drift potential.

- **Spray Volume.** Apply this product in a minimum of 10 gallons of spray solution per acre. Use a higher spray volume when treating dense vegetation. Higher spray volumes may also allow the use of larger nozzle orifices (sizes) which produce coarser spray droplets.
- **Equipment Ground Speed.** Select a ground speed that will deliver the desired spray volume while maintaining the desired spray pressure, but do not exceed a ground speed of 15 miles per hour. Slower speeds generally result in better spray coverage and deposition on the target area.
- **Spray boom Height.** Spray at the appropriate boom height based on nozzle selection and nozzle spacing, but do not exceed a boom height of 24 inches above target pest or crop canopy. Set boom to lowest effective height over the target pest or crop canopy based on equipment manufacturer's directions. Automated boom height controllers are recommended with large booms to better maintain optimum nozzle to canopy height. Excessive boom height will increase the potential for drift.

Temperature and Humidity

When making applications in low relative humidity or temperatures above 91 degrees Fahrenheit, set up equipment to produce larger droplets to compensate for evaporation. Larger droplets have a lower surface to volume ratio and can be impacted less by temperature and humidity. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions

Do not apply this product during a temperature inversion. Drift potential can be high during a temperature inversion.

- During a temperature inversion, the atmosphere is very stable and vertical air mixing is restricted, which can cause small, suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions.
- Temperature inversions are characterized by increasing temperatures with altitude and are common on evenings and nights with limited cloud cover and light to no wind. Cooling of air at the earth's surface takes place and warmer air is trapped above it. They can begin to form as the sun sets and often continue into the morning.
- Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.
- The inversion will often dissipate with increased winds (above 3 MPH) or at sunrise when the surface air begins to warm (generally 3°F from morning low).

Wind Speed and Direction

- Drift potential is lowest between wind speeds of 3 to 10 miles per hour.
- Do not apply at wind speeds greater than 15 mph.
- For XtendiMax™ With VaporGrip™ Technology wind speed and direction restrictions see below table:

Wind speed	Application conditions and restrictions
<3 mph	Do not apply XtendiMax™ With VaporGrip™ Technology.
3-10 mph	Optimum application conditions for XtendiMax™ With VaporGrip™ Technology provided all other application requirements in this label are met.
>10 – 15 mph	Do not apply product when wind is blowing toward non-target sensitive crops.
> 15 mph	Do not apply XtendiMax™ With VaporGrip™ Technology.

NOTE: Local terrain can influence wind patterns. Every applicator must be familiar with local wind patterns and how they affect drift.

PROTECTION OF SENSITIVE AREAS

Maintain a 110 foot downwind buffer (when applying 22 fluid ounces of this product per acre) or a 220 foot downwind buffer (when applying 44 fluid ounces of this product per acre) between the last treated row and the closest downwind edge (in the direction in which the wind is blowing) of any area less the distance of any of the adjacent areas specified below.

To maintain this required buffer zone:

- No application swath can be initiated in, or into an area that is within the applicable buffer distance.

The following areas may be included in the buffer distance calculation when adjacent to field edges:

- Roads, paved or gravel surfaces.
- Planted agricultural fields containing: corn, dicamba tolerant cotton, dicamba tolerant soybean, sorghum, proso millet, small grains and sugarcane. If the applicator intends to include such crops as dicamba tolerant cotton and/or dicamba tolerant soybeans in the buffer distance calculation, the applicator must confirm the crops are in fact dicamba tolerant and not conventional cotton and/or soybeans.
- Agricultural fields that have been prepared for planting.
- Areas covered by the footprint of a building, silo, or other man made structure with walls and or roof.

Non-target Susceptible Crops

Failure to follow the requirements in this label could result in severe injury or destruction to desirable sensitive broadleaf crops and trees when contacting their roots, stems or foliage.

- Do not apply under circumstances where off-target movement may occur to food, forage, or other plantings that might be damaged or the crops thereof rendered unfit for sale, use or consumption.
- Do not allow contact of herbicide with foliage, green stems, exposed non-woody roots of crops, and desirable plants, including beans, cotton, flowers, fruit trees, grapes,

ornamentals, peas, potato, soybean, sunflower, tobacco, tomato, and other broadleaf plants because severe injury or destruction may result, including plants in a greenhouse.

- Small amounts of dicamba that may not be visible may injure susceptible broadleaf plants.
- Applicators are required to ensure that they are aware of the proximity to non-target susceptible crops, and to avoid potential adverse effects from drift of XtendiMax™ With VaporGrip™ Technology.

Before making an application, the applicator must survey the application site for neighboring non-target susceptible crops. The applicator must also consult sensitive crop registries to identify any commercial specialty or certified organic crops that may be located near the application site.

DO NOT APPLY this product when the wind is blowing toward adjacent commercially grown dicamba sensitive crops, including but not limited to, commercially grown tomatoes and other fruiting vegetables (EPA crop group 8), cucurbits (EPA crop group 9), and grapes.

Application Awareness

AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR

The interaction of equipment and weather related factors must be monitored to maximize performance and on-target spray deposition. The applicator is responsible for considering all of these factors when making a spray decision. The applicator is responsible for compliance with state and local pesticide regulations, including any state or local pesticide drift regulations.

Proper spray system equipment cleanout

Minute quantities of dicamba may cause injury to non-dicamba-tolerant soybeans and other sensitive crops (see the “Non-target Susceptible Crops” section of this label for more information).

Clean equipment immediately after using this product, using a triple rinse procedure as follows:

1. After spraying, drain the sprayer (including boom and lines) immediately. Do not allow the spray solution to remain in the spray boom lines overnight prior to flushing.
2. Flush tank, hoses, boom and nozzles with clean water.
3. Inspect and clean all strainers, screens and filters.
4. Prepare a cleaning solution with a commercial detergent or sprayer cleaner or ammonia according to the manufacturer's directions.
5. Take care to wash all parts of the tank, including the inside top surface. Start agitation in the sprayer and thoroughly recirculate the cleaning solution for at least 15 minutes. All visible deposits must be removed from the spraying system.
6. Flush hoses, spray lines and nozzles for at least 1 minute with the cleaning solution.
7. Repeat above steps for two additional times to accomplish an effective triple rinse.
8. Remove nozzles, screens and strainers and clean separately in the cleaning solution after completing the above procedures.
9. Appropriately dispose of rinsate from steps 1-7 in compliance with all applicable laws and regulations.

10. Drain sump, filter and lines.
11. Rinse the complete spraying system with clean water.

All rinse water must be disposed of in compliance with local, state, and federal requirements.

CROP ROTATIONAL RESTRICTIONS

No rotational cropping restrictions apply when rotating to Roundup Ready® 2 Xtend™ Soybeans or Bollgard II® XtendFlex® Cotton. For other crops the interval between application and planting rotational crop is given below. When counting days from the application of this product, do not count days when the ground is frozen. Planting at intervals less than specified below may result in crop injury. Moisture is essential for the degradation of this herbicide in soil. If dry weather prevails, use cultivation to allow herbicide contact with moist soil.

Planting/replanting restrictions for XtendiMax™ With VaporGrip™ Technology applications of 33 fluid ounces per acre or less

For corn, cotton (except Bollgard II® XtendFlex® Cotton), sorghum, and soybean (except Roundup Ready® 2 Xtend™ Soybean), follow the planting restrictions in the directions for use for preplant application in **Section 10. Crop-Specific Information** of the label booklet. Do not plant barley, oat, wheat, and other grass seedings for 15 days for every 11 fluid ounces of this product applied per acre east of the Mississippi River and 22 days for every 11 fluid ounces per acre applied west of the Mississippi River. No planting restrictions apply beyond 120 days after application of this product.

Planting/replanting restrictions for applications of more than 33 fluid ounces and up to 44 fluid ounces of XtendiMax™ With VaporGrip™ Technology per acre

Wait a minimum of 120 days after application of this product before planting corn, sorghum and cotton (except Bollgard II® XtendFlex® Cotton) east of the Rocky Mountains and before planting all other crops (except Roundup Ready® 2 Xtend™ Soybean) grown in areas receiving 30 inches or more rainfall annually. Wait a minimum of 180 days before planting crops in areas with less than 30 inches of annual rainfall. Wait a minimum of 30 days for every 22 fluid ounces of this product applied per acre before planting barley, oat, wheat, and other grass seedings east of the Mississippi River and 45 days for every 22 fluid ounces of this product applied per acre west of the Mississippi River.

LIMIT OF WARRANTY AND LIABILITY

Monsanto Company ("Company") warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in this supplemental label ("Directions") when used in accordance with the Directions under the conditions described therein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein. Specifically, and without limiting the foregoing, MONSANTO MAKES NO RECOMMENDATION OR WARRANTY HEREIN REGARDING THE USE OF ANY PRODUCTS THAT MAY APPEAR ON THE WEBSITE REFERENCED IN THE TANK-MIXING INSTRUCTIONS HEREIN, REGARDLESS OF WHETHER SUCH PRODUCT IS USED ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. BUYER AND ALL USERS ARE SOLELY RESPONSIBLE FOR ANY LACK OF PERFORMANCE, LOSS, OR DAMAGE IN CONNECTION WITH THE USE OR HANDLING OF ANY SUCH PRODUCT ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, tort, or otherwise.

To the extent consistent with applicable law, buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those expressly recommended by Company in the Directions, application to or contact with desirable vegetation, failure of this product to control weed biotypes which develop resistance to dicamba, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those expressly recommended by Company in the Directions in or on the soil, crop or treated vegetation.

This Company does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from this Company.

For in-crop (over-the-top) uses on crops within the Roundup Ready Xtend® Crop System, crop safety and weed control performance are not warranted by Company when this product is used in conjunction with "brown bag" or "bin run" seed saved from previous year's production and replanted.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Upon opening and using this product, buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement.

These terms apply to this supplemental labeling and if these terms are not acceptable, return the product unopened at once.

©[YEAR]

MONSANTO COMPANY
800 N. LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63167 USA

[INSERT DATE]

[INSERT PRINT PLATE NUMBER]

[INSERT SUPPLEMENTAL LABEL EXPIRATION DATE]

SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

When using XtendiMax™ With VaporGrip™ Technology as permitted according to this supplemental labeling, read and follow all applicable directions, restrictions, and precautions on the container label and booklet provided with the product container and on this supplemental labeling. This supplemental labeling must be in the possession of the user at the time of pesticide application.

This supplemental label expires on 11/xx/2018 and must not be used or distributed after this date.

XtendiMax™ With VaporGrip™ Technology

EPA Reg. No. 524-617

GROUP	4	HERBICIDE
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FOR PREEMERGENCE AND POSTEMERGENCE USE ON ROUNDUP READY 2 XTEND® SOYBEANS

Keep out of reach of children

CAUTION!

In case of an emergency involving this product, call collect, day or night, 314-694-4000.

Bollgard II®, Roundup Ready®, Roundup Ready 2 Xtend®, XtendiMax™, XtendFlex® and VaporGrip™ are trademarks of Monsanto Technology LLC. All other trademarks are the property of their respective owners.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

This labeling must be in the possession of the user at the time of herbicide application.

ROUNDUP READY 2 XTEND® SOYBEANS CONTAIN A PATENTED GENE THAT PROVIDES TOLERANCE TO DICAMBA, THE ACTIVE INGREDIENT IN THIS PRODUCT.

THIS PRODUCT WILL CAUSE SEVERE CROP INJURY OR DESTRUCTION AND YIELD LOSS IF APPLIED TO SOYBEANS THAT ARE NOT DICAMBA TOLERANT, INCLUDING SOYBEANS WITH A TRAIT ENGINEERED TO CONFER TOLERANCE TO AUXIN HERBICIDES OTHER THAN DICAMBA. FOLLOW THE REQUIREMENTS SET FORTH HEREIN TO PREVENT SEVERE CROP INJURY OR DESTRUCTION AND YIELD LOSS. CONTACT WITH FOLIAGE, GREEN STEMS, OR FRUIT OF CROPS, OR ANY DESIRABLE PLANTS THAT DO NOT CONTAIN A DICAMBA TOLERANCE GENE OR ARE NOT NATURALLY TOLERANT TO DICAMBA, COULD RESULT IN SEVERE PLANT INJURY OR DESTRUCTION.

Information on Roundup Ready 2 Xtend® Soybeans can be obtained from your seed supplier or Monsanto representative. Roundup Ready 2 Xtend® Soybeans must be purchased from an authorized licensed seed supplier.

The instructions contained in this Monsanto Supplemental Label include all applications of XtendiMax™ With VaporGrip™ Technology that may be made to Roundup Ready 2 Xtend® Soybeans during the cropping season. DO NOT combine these instructions with other instructions in the "SOYBEAN" Section of any other XtendiMax™ With VaporGrip™ Technology label for use over crops that do not contain the dicamba tolerance trait.

Note: Roundup Ready 2 Xtend® Soybeans and methods of controlling weeds and applying dicamba in a Roundup Ready 2 Xtend® Soybean crop are protected under U.S. patent law. No license to use Roundup Ready 2 Xtend® Soybeans are granted or implied with the purchase of this herbicide product. Roundup Ready 2 Xtend® Soybeans are owned by Monsanto and a license must be obtained from Monsanto before using it. Contact your Authorized Monsanto Retailer for information on obtaining a license to Roundup Ready 2 Xtend® Soybeans.

See the "PRODUCT INFORMATION" and "APPLICATION EQUIPMENT AND TECHNIQUES" sections of the XtendiMax™ With VaporGrip™ Technology product label for important use information. In the event that there are any inconsistencies with the directions for use between this supplemental label and any other labeling for this product, follow the directions for use on this supplemental label.

Training and education on proper pesticide application is encouraged. Applicators should visit www.xtendimaxapplicationrequirements.com for training information and opportunities relative to this product.

TYPES OF APPLICATIONS: Preplant; At-Planting; Preemergence; Postemergence (In-crop)

XtendiMax™ With VaporGrip™ Technology is approved by U.S. EPA to be used in the following states, subject to county restriction as noted: Alabama, Arkansas, Arizona, Colorado, Delaware, Florida (excluding Palm Beach County), Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oklahoma, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee (excluding Wilson County), Texas, Virginia, West Virginia, Wisconsin.

Restrictions

- Do not apply this product aerially.
- Do not make application of this product if rain is expected in the next 24 hours.

USE INSTRUCTIONS

Apply this product in a minimum of 10 gallons of spray solution per acre as a broadcast application. For best performance, control weeds early when they are less than 4 inches. Timely application will improve control and reduce weed competition. Refer to the following table for maximum application rates of this product with Roundup Ready 2 Xtend® Soybeans.

Maximum Application Rates	
Combined total per year for all applications	88 fluid ounces per acre (2.0 lb. a.e. dicamba per acre)
Total of all Burndown/Early preplant, Preplant, At-Planting, and Preemergence applications	44 fluid ounces per acre (1.0 lb. a.e. dicamba per acre)
Total of all In-crop applications from emergence up to and including beginning bloom (R1 stage soybeans)	44 fluid ounces per acre (1.0 lb. a.e. dicamba per acre)
Maximum In-crop, single application	22 fluid ounces per acre (0.5 lb. a.e. dicamba per acre)

a.e. – acid equivalent

Refer to Table 1 of the XtendiMax™ With VaporGrip™ Technology label booklet for application rates for weed type and growth stage controlled by this product. Maximum in-crop application rate should be used when treating tough to control weeds, dense vegetative growth or weeds with a well-established root system.

Preplant, At-Planting, Preemergence

USE INSTRUCTIONS: This product may be used to control broadleaf weeds and may be applied before, during or immediately after planting Roundup Ready 2 Xtend® Soybeans. Refer to the “WEEDS CONTROLLED” section of the label booklet for XtendiMax™ With VaporGrip™ Technology for specific weeds controlled.

RESTRICTIONS: The maximum combined quantity of this product that may be applied for all preplant, at-planting, and preemergence applications is 44 fluid ounces (1.0 lb a.e. dicamba) per acre per season. The maximum application rate for a single, preplant, at-planting, or preemergence application must not exceed 44 fluid ounces (1.0 lb a.e. dicamba) per acre. Do not apply less than 22 fluid ounces (0.5 lb a.e. dicamba) per acre.

Postemergence (In-crop)

USE INSTRUCTIONS: This product may be used to control broadleaf weeds in Roundup Ready 2 Xtend® Soybeans. In-crop applications of this product can be made from emergence (cracking) up to and including beginning bloom (R1 growth stage of soybeans). Do not make in-crop applications of this product after beginning bloom (R1 growth stage of soybeans). The maximum and minimum rate for any single, in-crop application is 22 fluid ounces (0.5 lb a.e. dicamba) per acre. Using the appropriate application rate may reduce the selection for resistant weeds. For best performance, control weeds early when they are less than 4 inches. Monsanto Company does not warrant product performance of applications to labeled weeds greater than 4 inches in height.

A second application of this product up to the R1 crop growth stage may be necessary to control new flushes of weeds. Allow at least 7 days between applications. For best results, apply XtendiMax™ With VaporGrip™ Technology after some weed re-growth has occurred.

Application of this product postemergence and under stressful environments may cause temporary loss of turgor, a response commonly described as leaf droop in Roundup Ready 2 Xtend® Soybeans. Typically, affected plants recover in 1-3 days depending on the level of droop and environmental conditions.

RESTRICTIONS:

- The combined total application rate from crop emergence up to R1 must not exceed 44 fluid ounces (1.0 lb. a.e. dicamba) per acre.
- The maximum single, in-crop application rate must not exceed 22 fluid ounces (0.5 lb. a.e. dicamba) per acre.
- The combined total per year for all applications must not exceed 88 fluid ounces (2.0 lb. a.e. dicamba) per acre.
- Allow at least 7 days between final application and harvest or feeding of soybean forage.
- Allow at least 14 days between final application and harvest or feeding of soybean hay.

TANK-MIXING INSTRUCTIONS

XtendiMax™ With VaporGrip™ Technology may only be tank-mixed with products that have been tested and found not to adversely affect the offsite movement potential of XtendiMax™ With VaporGrip™ Technology. A list of those products may be found at www.xtendimaxapplicationrequirements.com. DO NOT tank mix any product with XtendiMax™ With VaporGrip™ Technology unless:

1. You check the list of tested products found not to adversely affect the offsite movement potential of XtendiMax™ With VaporGrip™ Technology at www.xtendimaxapplicationrequirements.com no more than 7 days before applying XtendiMax™ With VaporGrip™ Technology; and
2. The intended tank-mix product is identified on the list of tested products ~~are identified~~; and
3. The intended products are not prohibited on either this supplemental label or the label of the tank mix product.
4. Additional Warnings and Restrictions:

- Some COC, HSOC and MSO adjuvants may cause a temporary crop response.
- Do not tank mix products containing ammonium salts such as ammonium sulfate and urea ammonium nitrate.
- Drift reduction agents (DRAs) can minimize the percentage of driftable fines. However, the applicator must check www.xtendimaxapplicationrequirements.com to determine if the DRA is listed and check with the DRA manufacturer to determine if the DRAs will work effectively with the approved spray nozzle, spray pressure, and the desired spray solution.

MONSANTO MAKES NO RECOMMENDATION OR WARRANTY HEREIN REGARDING THE USE OF ANY PRODUCT THAT MAY APPEAR ON THE WEBSITE REFERENCED ABOVE, REGARDLESS OF WHETHER SUCH PRODUCT IS USED TO THE EXTEND CONSISTENT

WITH APPLICABLE LAW ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. BUYER AND ALL USERS ARE SOLELY RESPONSIBLE FOR ANY LACK OF PERFORMANCE, LOSS, OR DAMAGE IN CONNECTION WITH THE USE OR HANDLING OF ANY SUCH PRODUCT ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. See the section titled "LIMIT OF WARRANTY AND LIABILITY" herein for more information.

WEED RESISTANCE MANAGEMENT

Some naturally occurring weed biotypes that are tolerant (resistant) to dicamba may exist due to genetic variability in a weed population. Where resistant biotypes exist, the repeated use of herbicides with the same sites of action can lead to the selection for resistant weeds. Certain agronomic practices can delay or reduce the likelihood that resistant weed populations will develop and can be utilized to manage weed resistance once it occurs.

Do not use less than 22 fluid ounces per acre (0.5 lb a.e./A) of this product in a single application. Using the appropriate application rate can minimize the selection for resistant weeds.

Proactively implementing diversified weed control strategies to minimize selection for weed populations resistant to one or more herbicides is a best practice. A diversified weed management program may include the use of multiple herbicides with different sites of action and overlapping weed spectrum with or without tillage operations and/or other cultural practices. Research has demonstrated that using the labeled rate and directions for use is important to delay the selection for resistance.

The continued effectiveness of this product depends on the successful management of the weed resistance program; therefore, it is very important to perform the following actions.

To aid in the prevention of developing weeds resistant to this product, the following steps should be followed where practical:

- Scout fields before application to ensure herbicides and rates will be appropriate for the weed species and weed sizes present.
- Apply full rates of XtendiMax™ With VaporGrip™ Technology for the most difficult to control weed in the field at the specified time (correct weed size) to minimize weed escapes.
- Scout fields after application to detect weed escapes or shifts in weed species.
- Report any incidence of non-performance of this product against a particular weed species to your Monsanto retailer, representative or call 1-844-RRXTEND.
- If resistance is suspected, treat weed escapes with an herbicide having a site of action other than Group 4 and/or use non-chemical methods to remove escapes, as practical, with the goal of preventing further seed production.

Additionally, users should follow as many of the following herbicide resistance management practices as is practical:

- Use a broad spectrum soil-applied herbicide with other sites of action as a foundation in a weed control program.
- Utilize sequential applications of herbicides with alternative sites of action.

- Rotate the use of this product with non-Group 4 herbicides.
- Avoid making more than two applications of dicamba and any other Group 4 herbicides within a single growing season unless mixed with another mechanism of action with an overlapping spectrum for the difficult to control weeds.
- Incorporate non-chemical weed control practices, such as mechanical cultivation, crop rotation, cover crops and weed-free crop seeds, as part of an integrated weed control program.
- Thoroughly clean plant residues from equipment before leaving fields suspected to contain resistant weeds.
- Manage weeds in and around fields, during and after harvest to reduce weed seed production.

Contact the local agricultural extension service, Monsanto representative, agricultural retailer or crop consultant for further guidance on weed control practices as needed.

APPLICATION EQUIPMENT AND TECHNIQUES

DO NOT APPLY THIS PRODUCT TO ROUNDUP READY 2 XTEND® SOYBEANS USING AERIAL SPRAY EQUIPMENT.

Apply this product using properly maintained and calibrated equipment capable of delivering the desired volumes.

SPRAY DRIFT MANAGEMENT

Do not allow herbicide solution to mist, drip, drift or splash onto desirable vegetation because severe injury or destruction to desirable broadleaf plants could result. The following drift management requirements must be followed.

Controlling Droplet Size

Drift potential may be reduced by applying large droplets that provide sufficient coverage and control. Applying larger droplets can reduce drift potential, but will not prevent drift if the application is made improperly, or under unfavorable environmental conditions (see the “**Wind Speed and Direction**”, “**Temperature and Humidity**” and “**Temperature Inversions**” sections of this label).

- **Nozzle type.** Use only Tee Jet® TT111004 nozzle with a maximum operating pressure of 63 psi when applying XtendiMax™ With VaporGrip™ Technology or any other approved nozzle found at www.xtendimaxapplicationrequirements.com. Do not use any other nozzle and pressure combination not specifically listed on this website.
- **Hooded Sprayers.** Using a hooded sprayer in combination with approved nozzles may further reduce drift potential.
- **Spray Volume.** Apply this product in a minimum of 10 gallons of spray solution per acre. Use a higher spray volume when treating dense vegetation. Higher spray volumes may also allow the use of larger nozzle orifices (sizes) which produce coarser spray droplets.

- **Equipment Ground Speed.** Select a ground speed that will deliver the desired spray volume while maintaining the desired spray pressure, but do not exceed a ground speed of 15 miles per hour. Slower speeds generally result in better spray coverage and deposition on the target area.
- **Spray boom Height.** Spray at the appropriate boom height based on nozzle selection and nozzle spacing, but do not exceed a boom height of 24 inches above target pest or crop canopy. Set boom to lowest effective height over the target pest or crop canopy based on equipment manufacturer's directions. Automated boom height controllers are recommended with large booms to better maintain optimum nozzle to canopy height. Excessive boom height will increase the drift potential.

Temperature and Humidity

When making applications in low relative humidity or temperatures above 91 degrees Fahrenheit, set up equipment to produce larger droplets to compensate for evaporation. Larger droplets have a lower surface to volume ratio and can be impacted less by temperature and humidity. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions

Do not apply this product during a temperature inversion. Drift potential can be high during a temperature inversion.

- During a temperature inversion, the atmosphere is very stable and vertical air mixing is restricted, which can cause small, suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions.
- Temperature inversions are characterized by increasing temperatures with altitude and are common on evenings and nights with limited cloud cover and light to no wind. Cooling of air at the earth's surface takes place and warmer air is trapped above it. They can begin to form as the sun sets and often continue into the morning.
- Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.
- The inversion will often dissipate with increased winds (above 3 mph) or at sunrise when the surface air begins to warm (generally 3°F from morning low).

Wind Speed and Direction

- Drift potential is lowest between wind speeds of 3 to 10 miles per hour.
- Do not apply at wind speeds greater than 15 mph.
- For XtendiMax™ With VaporGrip™ Technology wind speed and direction restrictions see below table:

Wind speed	Application conditions and restrictions
<3 mph	Do not apply XtendiMax™ With VaporGrip™ Technology.
3-10 mph	Optimum application conditions for XtendiMax™ With VaporGrip™ Technology provided all other application requirements in this label are met.
>10 – 15 mph	Do not apply product when wind is blowing toward non-target sensitive crops.
> 15 mph	Do not apply XtendiMax™ With VaporGrip™ Technology.

NOTE: Local terrain can influence wind patterns. Every applicator must be familiar with local wind patterns and how they affect drift.

PROTECTION OF SENSITIVE AREAS

Maintain a 110 foot downwind buffer (when applying 22 fluid ounces of this product per acre) or a 220 foot downwind buffer (when applying 44 fluid ounces of this product per acre) between the last treated row and the closest downwind edge (in the direction in which the wind is blowing) of any area less the distance of any of the adjacent areas specified below.

To maintain this required buffer zone:

- No application swath can be initiated in, or into an area that is within the applicable buffer distance.

The following areas may be included in the buffer distance calculation when adjacent to field edges:

- Roads, paved or gravel surfaces.
- Planted agricultural fields containing: corn, dicamba tolerant cotton, dicamba tolerant soybean, sorghum, proso millet, small grains and sugarcane. If the applicator intends to include such crops as dicamba tolerant cotton and/or dicamba tolerant soybeans in the buffer distance calculation, the applicator must confirm the crops are in fact dicamba tolerant and not conventional cotton and/or soybeans.
- Agricultural fields that have been prepared for planting.
- Areas covered by the footprint of a building, silo, or other man made structure with walls and or roof.

Non-target Susceptible Crops

Failure to follow the requirements in this label could result in severe injury or destruction to desirable sensitive broadleaf crops and trees when contacting their roots, stems or foliage.

- Do not apply under circumstances where drift may occur to food, forage, or other plantings that might be damaged or the crops thereof rendered unfit for sale, use or consumption.
- Do not allow contact of herbicide with foliage, green stems, exposed non-woody roots of crops, and desirable plants, including beans, cotton, flowers, fruit trees, grapes,

ornamentals, peas, potato, soybean, sunflower, tobacco, tomato, and other broadleaf plants because severe injury or destruction may result, including plants in a greenhouse.

- Small amounts of dicamba that may not be visible may injure susceptible broadleaf plants.
- Applicators are required to ensure that they are aware of the proximity to non-target susceptible crops, and to avoid potential adverse effects from drift of XtendiMax™ with VaporGrip™ Technology.

Before making an application, the applicator must survey the application site for neighboring non-target susceptible crops. The applicator must also consult sensitive crop registries to identify any commercial specialty or certified organic crops that may be located near the application site.

DO NOT APPLY this product when the wind is blowing toward adjacent commercially grown dicamba sensitive crops, including but not limited to, commercially grown tomatoes and other fruiting vegetables (EPA crop group 8), cucurbits (EPA crop group 9), and grapes.

Application Awareness

AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR

The interaction of equipment and weather related factors must be monitored to maximize performance and on-target spray deposition. The applicator is responsible for considering all of these factors when making a spray decision. The applicator is responsible for compliance with state and local pesticide regulations, including any state or local pesticide drift regulations.

Proper spray system equipment cleanout

Minute quantities of dicamba may cause injury to non-dicamba-tolerant soybeans and other sensitive crops (see the “Non-target Susceptible Crops” section of this label for more information).

Clean equipment immediately after using this product using a triple rinse procedure as follows:

1. After spraying, drain the sprayer (including boom and lines) immediately. Do not allow the spray solution to remain in the spray boom lines overnight prior to flushing.
2. Flush tank, hoses, boom and nozzles with clean water.
3. Inspect and clean all strainers, screens and filters.
4. Prepare a cleaning solution with a commercial detergent or sprayer cleaner or ammonia according to the manufacturer's directions.
5. Take care to wash all parts of the tank, including the inside top surface. Start agitation in the sprayer and thoroughly recirculate the cleaning solution for at least 15 minutes. All visible deposits must be removed from the spraying system.
6. Flush hoses, spray lines and nozzles for at least 1 minute with the cleaning solution.
7. Repeat above steps for two additional times to accomplish an effective triple rinse.
8. Remove nozzles, screens and strainers and clean separately in the cleaning solution after completing the above procedures.
9. Appropriately dispose of rinsate from steps 1-7 in compliance with all applicable laws and regulations.

10. Drain sump, filter and lines.
11. Rinse the complete spraying system with clean water.

All rinse water must be disposed of in compliance with local, state, and federal requirements.

CROP ROTATIONAL RESTRICTIONS

No rotational cropping restrictions apply when rotating to Roundup Ready 2 Xtend® Soybeans or Bollgard II® XtendFlex® Cotton. For other crops the interval between application and planting rotational crop is given below. When counting days from the application of this product, do not count days when the ground is frozen. Planting at intervals less than specified below may result in crop injury. Moisture is essential for the degradation of this herbicide in soil. If dry weather prevails, use cultivation to allow herbicide contact with moist soil.

Planting/replanting restrictions for XtendiMax™ With VaporGrip™ Technology applications of 33 fluid ounces per acre or less

For corn, cotton (except Bollgard II® XtendFlex® Cotton), sorghum, and soybean (except Roundup Ready 2 Xtend® Soybeans), follow the planting restrictions in the directions for use for preplant application in **Section 10. Crop-Specific Information** of the label booklet. Do not plant barley, oat, wheat, and other grass seedings for 15 days for every 11 fluid ounces of this product applied per acre east of the Mississippi River and 22 days for every 11 fluid ounces per acre applied west of the Mississippi River. No planting restrictions apply beyond 120 days after application of this product.

Planting/replanting restrictions for applications of more than 33 fluid ounces and up to 44 fluid ounces of XtendiMax™ With VaporGrip™ Technology per acre

Wait a minimum of 120 days after application of this product before planting corn, sorghum and cotton (except Bollgard II® XtendFlex® Cotton) east of the Rocky Mountains and before planting all other crops (except Roundup Ready 2 Xtend® Soybeans) grown in areas receiving 30 inches or more rainfall annually. Wait a minimum of 180 days before planting crops in areas with less than 30 inches of annual rainfall. Wait a minimum of 30 days for every 22 fluid ounces of this product applied per acre before planting barley, oat, wheat, and other grass seedings east of the Mississippi River and 45 days for every 22 fluid ounces of this product applied per acre west of the Mississippi River.

LIMIT OF WARRANTY AND LIABILITY

Monsanto Company ("Company") warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in this supplemental label ("Directions") when used in accordance with the Directions under the conditions described therein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein. Specifically, and without limiting the foregoing, MONSANTO MAKES NO RECOMMENDATION OR WARRANTY HEREIN REGARDING THE USE OF ANY PRODUCTS THAT MAY APPEAR ON THE WEBSITE REFERENCED IN THE TANK-MIXING INSTRUCTIONS HEREIN, REGARDLESS OF WHETHER SUCH PRODUCT IS USED ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. BUYER AND ALL USERS ARE SOLELY RESPONSIBLE FOR ANY LACK OF PERFORMANCE, LOSS, OR DAMAGE IN CONNECTION WITH THE USE OR HANDLING OF ANY SUCH PRODUCT ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, tort, or otherwise.

To the extent consistent with applicable law, buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those expressly recommended by Company in the Directions, application to or contact with desirable vegetation, failure of this product to control weed biotypes which develop resistance to dicamba, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those expressly recommended by Company in the Directions in or on the soil, crop or treated vegetation.

This Company does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from this Company.

For in-crop (over-the-top) uses on crops within the Roundup Ready® Xtend™ Crop System, crop safety and weed control performance are not warranted by Company when this product is used in conjunction with "brown bag" or "bin run" seed saved from previous year's production and replanted.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Upon opening and using this product, buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement.

These terms apply to this supplemental labeling and if these terms are not acceptable, return the product unopened at once.

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MONSANTO COMPANY
800 N. LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63167 USA

[INSERT DATE]

[INSERT PRINT PLATE NUMBER]

[INSERT SUPPLEMENTAL LABEL EXPIRATION DATE]

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 7/5/2017 10:17:04 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Dicamba meeting

Jeff,

I went ahead and sent BASFs Technical Bulletin around to the participants in tomorrow's meeting.

Regarding Topramezone, the Agency acknowledges and accept BASFs extension request. Thank you.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Wednesday, July 05, 2017 2:59 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: Dicamba meeting

Hello Grant,

I wanted to forward a Technical Information Bulletin (TIB) that BASF has put together and began distributing about two weeks ago on temperature inversions. Please share with the team for tomorrow's meeting. Just an example of how BASF is trying to respond to the drift issues in the mid-south and provide applicators with the information that they need.

Also, I will be travelling out of the country until July 25. I believe that we have the PRIA date for the topramezone sugarcane use coming up around July 12. I expect that we will need to extend the PRIA date, due to the lack of movement toward the issuing of the residue tolerance. BASF would like to request and extension of the PRIA date until September 12, 2017. Please acknowledge that this extension is acceptable.

Thanks, and I will see you tomorrow.

Jeff

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 9/6/2016 5:16:03 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Proposed meeting with BASF

Thanks Jeff.

See you then

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Tuesday, September 06, 2016 1:10 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Cc: Montague, Kathryn V. <Montague.Kathryn@epa.gov>; John J Arthur <john.arthur@basf.com>; Richard L Braddock <richard.braddock@basf.com>; Ada M Breaux <ada.breaux@basf.com>; Maximilian M Safarpour <maximilian.safarpour@basf.com>
Subject: RE: Proposed meeting with BASF

Grant,

I have attached a short agenda for our 9:00 meeting this Thursday to discuss Engenia.

See you then,

Jeff

Jeffrey H. Birk, Ph.D.
Product Registration Manager

Phone: 919-547-2622 Mobile: 919-225-9220 E-Mail: jeffrey.birk@basf.com
Postal Address: 26 Davis Drive, RTP, NC 27709

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From: Rowland, Grant [mailto:Rowland.Grant@epa.gov]
Sent: Thursday, August 11, 2016 2:56 PM
To: Jeffrey H Birk <jeffrey.birk@basf.com>
Subject: RE: Proposed meeting with BASF

Hi Jeff,

I just wanted to let you know I got your message and have been working with upper management to get this meeting scheduled. I'll let you know as soon as we have a time and date for you.

-Grant

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

From: Jeffrey H Birk [<mailto:jeffrey.birk@basf.com>]
Sent: Friday, August 05, 2016 3:19 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Cc: Ada M Breaux <ada.breaux@basf.com>; John J Arthur <john.arthur@basf.com>; Richard L Braddock <richard.braddock@basf.com>
Subject: Proposed meeting with BASF

Hello Grant,

Ada Breaux, has been speaking with Dan Kenny, and they agreed that it might be best if BASF could get together with a small group from EPA to talk through the pending DT use registration and Engenia herbicide. I can send a proposed agenda next week, but it would include a brief overview of what BASF has been doing to address concerns about dicamba volatility and potential synergy between dicamba and other herbicides. We would suggest that it may also be helpful to have an open discussion about the dicamba drift issues resulting from the illegal use of dicamba in DT crops this year, as well as the propose inadvertent dicamba residue tolerances. We would be happy to discuss any other issues or concerns that EPA is wrestling with over the proposed dicamba DT use decision.

Myself and two or three other individuals from BASF will participate in the meeting. In addition to yourself BASF would like to suggest that the following EPA individuals participate in the meeting:

Rick Keigwin
Mike Goodis
Dan Kenny
Kay Montague
Representatives from EFED

It would be great if we could find time to have the meeting within the next couple of weeks.

Please let me know if you have any questions, and thank you in advance to trying to setup this meeting.

Have a great weekend,

Jeff

Jeffrey H. Birk, Ph.D.
Product Registration Manager

Phone: 919-547-2622 Mobile: 919-225-9220 E-Mail: jeffrey.birk@basf.com
Postal Address: 26 Davis Drive, RTP, NC 27709

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Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 11/1/2016 9:01:07 PM
To: CUBBAGE, JERRY W [AG/1000] [jerry.w.cubbage@monsanto.com]
Subject: RE: Dicamba Labels
Attachments: 524-617 20161101 XtendimaxDTCottonSupLabel EPA-comments.pdf; 524-617 20161101 XtendimaxDTSoybeanSupLabel - w-EPA comments.pdf

Hi Jerry,

Here they are. Take a look and get back to us as soon as you are ready.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: CUBBAGE, JERRY W [AG/1000] [mailto:jerry.w.cubbage@monsanto.com]
Sent: Tuesday, November 01, 2016 4:56 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba Labels

Grant,

Hi, do you think you will email the labels today?

Thanks
Jerry

From: Rowland, Grant [mailto:Rowland.Grant@epa.gov]
Sent: Tuesday, November 01, 2016 2:09 PM
To: CUBBAGE, JERRY W [AG/1000] <jerry.w.cubbage@monsanto.com>
Subject: Dicamba Labels

Hi Jerry,

I thought I would give you a heads up. We have the Dicamba labels with our comments attached just about ready to send over to you.

-Grant

Grant Rowland

*Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

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SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

When using XtendiMax™ With VaporGrip™ Technology as permitted according to this supplemental labeling, read and follow all applicable directions, restrictions, and precautions on the label booklet provided with the pesticide container and on this supplemental labeling. This supplemental labeling must be in the possession of the user at the time of pesticide application.

This supplemental label expires on xx/xx/xxxx a  must not be used or distributed after this date.

XtendiMax™ With VaporGrip™ Technology

EPA Reg. No. 524-617

GROUP	4	HERBICIDE
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FOR PREEMERGENCE AND POSTEMERGENCE USE ON BOLLGARD II® XTENDFLEX® COTTON

Keep out of reach of children

CAUTION!

In case of an emergency involving this product, call collect, day or night, 314-694-4000.

Bollgard II®, Roundup Ready®, Roundup Ready 2 Xtend® and XtendFlex® are trademarks of Monsanto Technology LLC. All other trademarks are the property of their respective owners.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

This labeling must be in the possession of the user at the time of herbicide application.

BOLLGARD II® XTENDFLEX® COTTON CONTAINS A PATENTED GENE THAT PROVIDES TOLERANCE TO DICAMBA, THE ACTIVE INGREDIENT IN THIS PRODUCT. THIS PRODUCT WILL CAUSE SEVERE CROP INJURY OR DESTRUCTION AND YIELD LOSS IF APPLIED TO COTTON THAT IS NOT DICAMBA TOLERANT, INCLUDING COTTON WITH A

TRAIT ENGINEERED TO CONFER TOLERANCE TO AUXIN HERBICIDES OTHER THAN DICAMBA. FOLLOW THE REQUIREMENTS SET FORTH HEREIN TO PREVENT SEVERE CROP INJURY OR DESTRUCTION AND YIELD LOSS. CONTACT WITH FOLIAGE, GREEN STEMS, OR FRUIT OF CROPS, OR ANY DESIRABLE PLANTS THAT DO NOT CONTAIN A DICAMBA TOLERANCE GENE OR ARE NOT NATURALLY TOLERANT TO DICAMBA, COULD RESULT IN SEVERE PLANT INJURY OR DESTRUCTION.

Information on Bollgard II® XtendFlex® Cotton can be obtained from your seed supplier or Monsanto representative. Bollgard II® XtendFlex® Cotton must be purchased from an authorized licensed seed supplier.

The instructions contained in this Monsanto Supplemental Label include all applications of XtendiMax™ With VaporGrip™ Technology that may be made to Bollgard II® XtendFlex® Cotton during the cropping season. DO NOT combine these instructions with other instructions in the "COTTON" Section of any other XtendiMax™ With VaporGrip™ Technology label for use over crops that do not contain the dicamba tolerance trait.

Note: Bollgard II® XtendFlex® Cotton and methods of controlling weeds and applying dicamba in a Bollgard II® XtendFlex® Cotton crop are protected under U.S. patent law. A license to use Bollgard II® XtendFlex® Cotton seed must be obtained prior to use. No license to use Bollgard II® XtendFlex® Cotton is granted or implied with the purchase of this herbicide product. Bollgard II® XtendFlex® Cotton is owned by Monsanto and a license must be obtained from Monsanto before using it. Contact your Authorized Monsanto Retailer for information on obtaining a license to Bollgard II® XtendFlex® Cotton.

See the "PRODUCT INFORMATION" and "APPLICATION EQUIPMENT AND TECHNIQUES" sections of the XtendiMax™ With VaporGrip™ Technology product label for important use information. The directions found on this supplemental label are controlling, where inconsistencies are found with any other product labeling.

Training and education on proper pesticide application is encouraged. Applicators should visit [INSERT URL] for training information and opportunities relevant to this product.



TYPES OF APPLICATIONS: Preplant; At-Planting; Preemergence; Postemergence (In-crop)

XtendiMax™ With VaporGrip™ Technology is approved by U.S. EPA to be used in the following states, subject to county restriction as noted: Alabama, Arkansas, Arizona, Colorado, Delaware, Florida (excluding Palm Beach County), Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oklahoma, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee (excluding Wilson County), Texas, Virginia, West Virginia, Wisconsin.

Restrictions:

- Do not apply this product aerially.
- Do not make application of this product if rain is expected in the next 24 hours.

USE INSTRUCTIONS: Apply this product in a minimum of 10 gallons of spray solution per acre as a broadcast application. For best performance, control weeds early when they are less than 4 inches. Timely application will improve control and reduce weed competition. Refer to the

following table for maximum application rates of this product with Bollgard II® XtendFlex® Cotton.

Maximum Application Rates	
Combined total per year for all applications	88 fluid ounces per acre (2.0 lb. a.e. dicamba per acre)
Total of all Preplant, At-Planting, and Preemergence applications	44 fluid ounces per acre (1.0 lb. a.e. dicamba per acre)
Total of all In-crop applications from emergence up to 7 days pre-harvest	88 fluid ounces per acre (2.0 lb. a.e. dicamba per acre)
Maximum In-crop, single application	22 fluid ounces per acre (0.5 lb. a.e. dicamba per acre)

a.e. – acid equivalent

Refer to Table 1 of the XtendiMax™ With VaporGrip™ Technology label booklet for application rates for weed type and growth stage controlled by this product. Maximum in-crop application rate should be used when treating tough to control weeds, dense vegetative growth or weeds with a well-established root system.

Preplant, At-Planting, Preemergence

USE INSTRUCTIONS: This product may be used to control broadleaf weeds and may be applied before, during or immediately after planting Bollgard II® XtendFlex® Cotton. Refer to the “WEEDS CONTROLLED” section of the label booklet for XtendiMax™ With VaporGrip™ Technology for specific weeds controlled.

RESTRICTIONS: The maximum combined quantity of this product that may be applied for all preplant, at-planting, and preemergence applications is 44 fluid ounces (1.0 lb a.e. dicamba) per acre per season. The maximum application rate for a single, preplant, at-planting, or preemergence application must not exceed 44 fluid ounces (1.0 lb a.e. dicamba) per acre. Do not apply less than 22 fluid ounces (0.5 lb a.e. dicamba) per acre.

Postemergence (In-crop)

USE INSTRUCTIONS: This product may be used to control broadleaf weeds in Bollgard II® XtendFlex® Cotton. In-crop applications of this product can be made from emergence up to 7 days prior to harvest. The maximum and minimum rate for any single, in-crop application is 22 fluid ounces (0.5 lb a.e. dicamba) per acre. Using the appropriate application rate may reduce the selection for resistant weeds. For best performance, control weeds early when they are less than 4 inches. Monsanto Company does not warrant product performance of applications to labeled weeds greater than 4 inches in height. Sequential applications of this product may be necessary to control new flushes of weeds or on tough-to-control weeds. Allow at least 7 days between applications. A pre-harvest application of this product may be made up to 7 days before harvest.


Postemergence applications of this product mixed with adjuvants may cause a leaf response to Bollgard II® XtendFlex® Cotton. The symptoms usually appear as necrotic spots on fully expanded leaves. To reduce the incidence and severity of the necrosis, consider increasing the spray volume to 15 GPA or greater and lower adjuvant rates. EC-based products that are tank


mixed with products containing dicamba may increase the severity of the leaf damage.


RESTRICTIONS:

- The combined total applied from crop emergence up to 7 days prior to harvest must not exceed 88 fluid ounces (2.0 lb a.e. dicamba) per acre.
- The maximum single, in-crop application rate must not exceed 22 fluid ounces (0.5 lb a.e. dicamba).
- The combined total per year for all applications must not exceed 88 fluid ounces (2.0 lb a.e. dicamba) per acre. For example, if a preplant application of 44 fluid ounces (1.0 lb a.e. dicamba) per acre was made, then the combined total in-crop applications must not exceed 44 fluid ounces (1.0 lb a.e. dicamba) per acre.
- Allow at least 7 days between applications and allow at least 7 days between final application and harvest or feeding of cottonseed and cotton gin by-products.

TANK-MIXING INSTRUCTIONS

~~XtendiMax™ With VaporGrip™ Technology may only be tank mixed with products that are listed at [INSERT URL HERE].~~  DO NOT tank mix any product with XtendiMax™ With VaporGrip™ Technology unless:

- ~~1. You check the list of products at [INSERT URL HERE]~~  more than 7 days before applying XtendiMax™ With VaporGrip™ Technology; and
- ~~2. The intended tank-mix products are identified on that website; and~~
3. The intended products are not prohibited on either this supplemental label or the label of the tank mix product.
4. Additional Warnings and Restrictions:

- Some COC, HSOC and MSO adjuvants may cause a temporary crop response.
- Do not tank mix products containing ammonium salts such as ammonium sulfate and urea ammonium nitrate.
- Drift reduction agents (DRAs) can minimize the percentage of driftable fines. However, the applicator must check [INSERT URL]  determine if the DRA is listed and check with the DRA manufacturer to determine if the DRAs will work effectively with the approved spray nozzle, spray pressure, and the desired spray solution.

MONSANTO MAKES NO RECOMMENDATION OR WARRANTY HEREIN REGARDING THE USE OF ANY PRODUCT THAT MAY APPEAR ON THE WEBSITE REFERENCED ABOVE, REGARDLESS OF WHETHER SUCH PRODUCT IS USED ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. BUYER AND ALL USERS ARE SOLELY RESPONSIBLE FOR ANY LACK OF PERFORMANCE, LOSS, OR DAMAGE IN CONNECTION WITH THE USE OR HANDLING OF ANY SUCH PRODUCT ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. See the section titled "LIMIT OF WARRANTY AND LIABILITY" herein for more information.

WEED RESISTANCE MANAGEMENT


Some naturally occurring weed biotypes that are tolerant (resistant) to dicamba may exist due to genetic variability in a weed population. Where resistant biotypes exist, the repeated use of herbicides with the same sites of action can lead to the selection for resistant weeds. Certain agronomic practices can delay or reduce the likelihood that resistant weed populations will develop and can be utilized to manage weed resistance once it occurs.

Do not use less than 22 fluid ounces per acre (0.5 lb a.e./A) of this product in a single application. Using the appropriate application rate can minimize the selection for resistant weeds.


Proactively implementing diversified weed control strategies to minimize selection for weed populations resistant to one or more herbicides is a best practice. A diversified weed management program may include the use of multiple herbicides with different sites of action and overlapping weed spectrum with or without tillage operations and/or other cultural practices. Research has demonstrated that using the labeled rate and directions for use is important to delay the selection for resistance.

The continued effectiveness of this product depends on the successful management of the weed resistance program; therefore, it is very important to perform the following actions.

To aid in the prevention of developing weeds resistant to this product, the following steps should be followed where practical:

- Scout fields before application to ensure herbicides and rates will be appropriate for the weed species and weed sizes present.
- Apply full rates of XtendiMax™ With VaporGrip™ Technology for the most difficult to control weed in the field at the specified time (correct weed size) to minimize weed escapes.
- Scout fields after application to detect weed escapes or shifts in weed species.
- Report any incidence of non-performance of this product against a particular weed species to your Monsanto retailer, representative or call [INSERT PHONE NUMBER] 
- If resistance is suspected, treat weed escapes with an herbicide having a site of action other than Group 4 and/or use non-chemical methods to remove escapes, as practical, with the goal of preventing further seed production.

Additionally, users should follow as many of the following herbicide resistance management practices as is practical:

- Use a broad spectrum soil-applied herbicide with other sites of action as a foundation in a weed control program.
- Utilize sequential applications of herbicides with alternative sites of action.
- Rotate the use of this product with non-Group 4 herbicides.
- Incorporate non-chemical weed control practices, such as mechanical cultivation, crop rotation, cover crops and weed-free crop seeds, as part of an integrated weed control program. 
- Thoroughly clean plant residues from equipment before leaving fields suspected to contain resistant weeds.
- Manage weeds in and around fields, during and after harvest to reduce weed seed production.

Contact the local agricultural extension service, Monsanto representative, agricultural retailer or crop consultant for further guidance on weed control practices as needed.

APPLICATION EQUIPMENT AND TECHNIQUES

DO NOT APPLY THIS PRODUCT TO BOLLGARD II® XTENDFLEX® COTTON USING AERIAL SPRAY EQUIPMENT.


Apply this product using properly maintained and calibrated equipment capable of delivering the desired volumes.

MANAGING OFF-TARGET MOVEMENT

Do not allow herbicide solution to mist, drip, drift or splash onto desirable vegetation because severe injury or destruction to desirable broadleaf plants could result. The following off-target movement management requirements must be followed.

Controlling Droplet Size

Off-target movement potential may be reduced by applying large droplets that provide sufficient coverage and control. Applying larger droplets can reduce off-target movement potential, but will not prevent off-target movement if the application is made improperly, or under unfavorable environmental conditions (see the “**Wind Speed and Direction**”, “**Temperature and Humidity**” and “**Temperature Inversions**” sections of this label).

- **Nozzle type.** A list of approved nozzles may be found at [INSERT URL HERE].  not use any other nozzle and pressure combination not specifically listed on this website.
- **Hooded Sprayers.** Using a hooded sprayer in combination with approved nozzles may further reduce off-target movement potential.
- **Spray Volume.** Apply this product in a minimum of 10 gallons of spray solution per acre. Use a higher spray volume when treating dense vegetation. Higher spray volumes may also allow the use of larger nozzle orifices (sizes) which produce coarser spray droplets.
- **Equipment Ground Speed.** Select a ground speed that will deliver the desired spray volume while maintaining the desired spray pressure, but do not exceed a ground speed of 15 miles per hour. Slower speeds generally result in better spray coverage and deposition on the target area.
- **Spray boom Height.** Spray at the appropriate boom height based on nozzle selection and nozzle spacing, but do not exceed a boom height of 24 inches above target pest or crop canopy. Set boom to lowest effective height over the target pest or crop canopy based on equipment manufacturer's directions. Automated boom height controllers are recommended with large booms to better maintain optimum nozzle to canopy height. Excessive boom height will increase the potential for off-target movement.

Temperature and Humidity

When making applications in low relative humidity or temperatures above 91 degrees Fahrenheit, set up equipment to produce larger droplets to compensate for evaporation. Larger

droplets have a lower surface to volume ratio and can be impacted less by temperature and humidity. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions

Do not apply this product during a temperature inversion. Off-target movement potential can be high during a temperature inversion.

- During a temperature inversion, the atmosphere is very stable and vertical air mixing is restricted, which can cause small, suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions.
- Temperature inversions are characterized by increasing temperatures with altitude and are common on evenings and nights with limited cloud cover and light to no wind. Cooling of air at the earth's surface takes place and warmer air is trapped above it. They can begin to form as the sun sets and often continue into the morning.
- Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.
- The inversion will often dissipate with increased winds (above 3 MPH) or at sunrise when the surface air begins to warm (generally 3°F from morning low).

Wind Speed and Direction

- Off-target movement potential is lowest between wind speeds of 3 to 10 miles per hour.
- Do not apply at wind speeds greater than 15 mph.
- For XtendiMax™ With VaporGrip™ Technology wind speed and direction restrictions see below table:

Wind speed	Application conditions and restrictions
<3 mph	Do not apply XtendiMax™ With VaporGrip™ Technology.
3-10 mph	Optimum application conditions for XtendiMax™ With VaporGrip™ Technology provided all other application requirements in this label are met.
>10 – 15 mph	Do not apply product when wind is blowing toward non-target sensitive crops.
> 15 mph	Do not apply XtendiMax™ With VaporGrip™ Technology.

NOTE: Local terrain can influence wind patterns. Every applicator must be familiar with local wind patterns and how they affect off-target movement.


PROTECTION OF SENSITIVE AREAS

Maintain a 110 foot downwind buffer (when applying 22 fluid ounces of this product per acre) or a 220 foot downwind buffer (when applying 44 fluid ounces of this product per acre) between the last treated row and the closest downwind edge (in the direction in which the wind is blowing) of any area less the distance of any of the adjacent areas specified below.

To maintain this required buffer zone:

- No application swath can be initiated in, or into an area that is within the applicable buffer distance.

The following areas may be included in the buffer distance calculation when adjacent to field edges:


- Roads, paved or gravel surfaces and fallow.
- Planted agricultural fields containing: corn, dicamba tolerant cotton, dicamba tolerant soybean, sorghum, proso millet, small grains and sugarcane. ~~If the applicator intends to include such crops in the buffer distance calculation, the applicator must confirm such crops are present in the buffer distance prior to application.~~ 
- Agricultural fields that have been prepared for planting.
- Areas covered by the footprint of a building, silo, or other man made structure with walls and or roof.

Non-target Susceptible Crops

Failure to follow the requirements in this label could result in severe injury or destruction to desirable sensitive broadleaf crops and trees when contacting their roots, stems or foliage.

- Do not apply under circumstances where off-target movement may occur to food, forage, or other plantings that might be damaged or the crops thereof rendered unfit for sale, use or consumption.
- Do not allow contact of herbicide with foliage, green stems, exposed non-woody roots of crops, and desirable plants, including beans, cotton, flowers, fruit trees, grapes, ornamentals, peas, potato, soybean, sunflower, tobacco, tomato, and other broadleaf plants because severe injury or destruction may result, including plants in a greenhouse.
- Small amounts of dicamba that may not be visible may injure susceptible broadleaf plants.
- Applicators are required to ensure that they are aware of the proximity to non-target susceptible crops, and to avoid potential adverse effects from off-target movement of XtendiMax™ With VaporGrip™ Technology.

Before making an application, the applicator must survey the application site for neighboring non-target susceptible crops. The applicator must also consult sensitive crop registries to identify any commercial specialty or certified organic crops that may be located near the application site.

DO NOT APPLY this product when the wind is blowing toward adjacent commercially grown sensitive crops. Specifically, commercially grown tomatoes and other fruiting vegetables (EPA crop group 8), cucurbits (EPA crop group 9), and grapes  sensitive to dicamba.

Application Awareness

AVOIDING ~~OFF-TARGET MOVEMENT~~ AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR

The interaction of equipment and weather related factors must be monitored to maximize performance and on-target spray deposition. The applicator is responsible for considering all of these factors when making a spray decision. The applicator is responsible for compliance with state and local pesticide regulations, including any state or local ~~regulation of off-target movement~~.

Proper spray system equipment cleanout

Minute quantities of dicamba may cause injury to non-dicamba-tolerant soybeans and other sensitive crops (see the “Non-target Susceptible Crops” section of this label for more information).

Clean equipment immediately after using this product, using a triple rinse procedure as follows:

1. After spraying, drain the sprayer (including boom and lines) immediately. Do not allow the spray solution to remain in the spray boom lines overnight prior to flushing.
2. Flush tank, hoses, boom and nozzles with clean water.
3. Inspect and clean all strainers, screens and filters.
4. Prepare a cleaning solution with a commercial detergent or sprayer cleaner or ammonia according to the manufacturer's directions.
5. Take care to wash all parts of the tank, including the inside top surface. Start agitation in the sprayer and thoroughly recirculate the cleaning solution for at least 15 minutes. All visible deposits must be removed from the spraying system.
6. Flush hoses, spray lines and nozzles for at least 1 minute with the cleaning solution.
7. Repeat above steps for two additional times to accomplish an effective triple rinse.
8. Remove nozzles, screens and strainers and clean separately in the cleaning solution after completing the above procedures.
9. Appropriately dispose of rinsate from steps 1-7 in compliance with all applicable laws and regulations.
10. Drain sump, filter and lines.
11. Rinse the complete spraying system with clean water.

All rinse water must be disposed of in compliance with local, state, and federal requirements.

CROP ROTATIONAL RESTRICTIONS

No rotational cropping restrictions apply when rotating to Roundup Ready® 2 Xtend™ Soybeans or Bollgard II® XtendFlex® Cotton. For other crops the interval between application and planting rotational crop is given below. When counting days from the application of this product, do not count days when the ground is frozen. Planting at intervals less than specified below may result in crop injury. Moisture is essential for the degradation of this herbicide in soil. If dry weather prevails, use cultivation to allow herbicide contact with moist soil.

Planting/replanting restrictions for XtendiMax™ With VaporGrip™ Technology applications of 33 fluid ounces per acre or less

For corn, cotton (except Bollgard II® XtendFlex® Cotton), sorghum, and soybean (except Roundup Ready® 2 Xtend™ Soybean), follow the planting restrictions in the directions for use for preplant application in **Section 10. Crop-Specific Information** of the label booklet. Do not plant barley, oat, wheat, and other grass seedings for 15 days for every 11 fluid ounces of this product applied per acre east of the Mississippi River and 22 days for every 11 fluid ounces per

acre applied west of the Mississippi River. No planting restrictions apply beyond 120 days after application of this product.

Planting/replanting restrictions for applications of more than 33 fluid ounces and up to 44 fluid ounces of XtendiMax™ With VaporGrip™ Technology per acre

Wait a minimum of 120 days after application of this product before planting corn, sorghum and cotton (except Bollgard II® XtendFlex® Cotton) east of the Rocky Mountains and before planting all other crops (except Roundup Ready® 2 Xtend™ Soybean) grown in areas receiving 30 inches or more rainfall annually. Wait a minimum of 180 days before planting crops in areas with less than 30 inches of annual rainfall. Wait a minimum of 30 days for every 22 fluid ounces of this product applied per acre before planting barley, oat, wheat, and other grass seedings east of the Mississippi River and 45 days for every 22 fluid ounces of this product applied per acre west of the Mississippi River.

LIMIT OF WARRANTY AND LIABILITY

Monsanto Company ("Company") warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in this supplemental label ("Directions") when used in accordance with the Directions under the conditions described therein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein. Specifically, and without limiting the foregoing, MONSANTO MAKES NO RECOMMENDATION OR WARRANTY HEREIN REGARDING THE USE OF ANY PRODUCTS THAT MAY APPEAR ON THE WEBSITE REFERENCED IN THE TANK-MIXING INSTRUCTIONS HEREIN, REGARDLESS OF WHETHER SUCH PRODUCT IS USED ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. BUYER AND ALL USERS ARE SOLELY RESPONSIBLE FOR ANY LACK OF PERFORMANCE, LOSS, OR DAMAGE IN CONNECTION WITH THE USE OR HANDLING OF ANY SUCH PRODUCT ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, tort, or otherwise.

To the extent consistent with applicable law, buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those expressly recommended by Company in the Directions, application to or contact with desirable vegetation, failure of this product to control weed biotypes which develop resistance to dicamba, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those expressly recommended by Company in the Directions in or on the soil, crop or treated vegetation.

This Company does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from this Company.

For in-crop (over-the-top) uses on crops within the Roundup Ready Xtend® Crop System, crop safety and weed control performance are not warranted by Company when this product is used in conjunction with "brown bag" or "bin run" seed saved from previous year's production and replanted.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF

THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Upon opening and using this product, buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement.

These terms apply to this supplemental labeling and if these terms are not acceptable, return the product unopened at once.

©[YEAR]

MONSANTO COMPANY
800 N. LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63167 USA

[INSERT DATE]

[INSERT PRINT PLATE NUMBER]

[INSERT SUPPLEMENTAL LABEL EXPIRATION DATE]

SUPPLEMENTAL LABELING

READ THE ENTIRE LABEL FOR XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

When using XtendiMax™ With VaporGrip™ Technology as permitted according to this supplemental labeling, read and follow all applicable directions, restrictions, and precautions on the label booklet provided with the pesticide container and on this supplemental labeling. This supplemental labeling must be in the possession of the user at the time of pesticide application.

This supplemental label expires on xx/xx/xxxx and must not be used or distributed after this date.

XtendiMax™ With VaporGrip™ Technology

EPA Reg. No. 524-617

GROUP	4	HERBICIDE
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FOR PREEMERGENCE AND POSTEMERGENCE USE ON ROUNDUP READY 2 XTEND® SOYBEANS

Keep out of reach of children

CAUTION!

In case of an emergency involving this product, call collect, day or night, 314-694-4000.

Bollgard II®, Roundup Ready®, Roundup Ready 2 Xtend®, XtendiMax™, XtendFlex® and VaporGrip™ are trademarks of Monsanto Technology LLC. All other trademarks are the property of their respective owners.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in any manner inconsistent with its labeling.

This labeling must be in the possession of the user at the time of herbicide application.

ROUNDUP READY 2 XTEND® SOYBEANS CONTAIN A PATENTED GENE THAT PROVIDES TOLERANCE TO DICAMBA, THE ACTIVE INGREDIENT IN THIS PRODUCT. THIS PRODUCT WILL CAUSE SEVERE CROP INJURY OR DESTRUCTION AND YIELD LOSS IF APPLIED TO SOYBEANS THAT ARE NOT DICAMBA TOLERANT, INCLUDING

SOYBEANS WITH A TRAIT ENGINEERED TO CONFER TOLERANCE TO AUXIN HERBICIDES OTHER THAN DICAMBA. FOLLOW THE REQUIREMENTS SET FORTH HEREIN TO PREVENT SEVERE CROP INJURY OR DESTRUCTION AND YIELD LOSS. CONTACT WITH FOLIAGE, GREEN STEMS, OR FRUIT OF CROPS, OR ANY DESIRABLE PLANTS THAT DO NOT CONTAIN A DICAMBA TOLERANCE GENE OR ARE NOT NATURALLY TOLERANT TO DICAMBA, COULD RESULT IN SEVERE PLANT INJURY OR DESTRUCTION.

Information on Roundup Ready 2 Xtend® soybeans can be obtained from your seed supplier or Monsanto representative. Roundup Ready 2 Xtend® soybeans must be purchased from an authorized licensed seed supplier.

The instructions contained in this Monsanto Supplemental Label include all applications of XtendiMax™ With VaporGrip™ Technology that may be made to Roundup Ready 2 Xtend® Soybeans during the cropping season. DO NOT combine these instructions with other instructions in the "SOYBEAN" Section of any other XtendiMax™ With VaporGrip™ Technology label for use over crops that do not contain the dicamba tolerance trait.

Note: Roundup Ready 2 Xtend® Soybeans and methods of controlling weeds and applying dicamba in a Roundup Ready 2 Xtend® Soybean crop are protected under U.S. patent law. No license to use Roundup Ready 2 Xtend® Soybeans are granted or implied with the purchase of this herbicide product. Roundup Ready 2 Xtend® Soybeans are owned by Monsanto and a license must be obtained from Monsanto before using it. Contact your Authorized Monsanto Retailer for information on obtaining a license to Roundup Ready 2 Xtend® Soybeans.

See the "PRODUCT INFORMATION" and "APPLICATION EQUIPMENT AND TECHNIQUES" sections of the XtendiMax™ With VaporGrip™ Technology product label for important use information. The directions found on this supplemental label are controlling, where inconsistencies are found with any other product labeling.

Training and education on proper pesticide application is encouraged. Applicators should visit



[INSERT URL] for training information and opportunities relative to this product.

TYPES OF APPLICATIONS: Preplant; At-Planting; Preemergence; Postemergence (In-crop)

XtendiMax™ With VaporGrip™ Technology is approved by U.S. EPA to be used in the following states, subject to county restriction as noted: Alabama, Arkansas, Arizona, Colorado, Delaware, Florida (excluding Palm Beach County), Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Minnesota, Mississippi, Missouri, Nebraska, New Jersey, New Mexico, New York, North Carolina, North Dakota, Oklahoma, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee (excluding Wilson County), Texas, Virginia, West Virginia, Wisconsin.

Restrictions

- Do not apply this product aerially.
- Do not make application of this product if rain is expected in the next 24 hours.

USE INSTRUCTIONS

Apply this product in a minimum of 10 gallons of spray solution per acre as a broadcast application. For best performance, control weeds early when they are less than 4 inches.

Timely application will improve control and reduce weed competition. Refer to the following table for maximum application rates of this product with Roundup Ready 2 Xtend® Soybeans.

Maximum Application Rates	
Combined total per year for all applications	88 fluid ounces per acre (2.0 lb. a.e. dicamba per acre)
Total of all Burndown/Early preplant, Preplant, At-Planting, and Preemergence applications	44 fluid ounces per acre (1.0 lb. a.e. dicamba per acre)
Total of all In-crop applications from emergence up to and including beginning bloom (R1 stage soybeans)	44 fluid ounces per acre (1.0 lb. a.e. dicamba per acre)
Maximum In-crop, single application	22 fluid ounces per acre (0.5 lb. a.e. dicamba per acre)

a.e. – acid equivalent

Refer to Table 1 of the XtendiMax™ With VaporGrip™ Technology label booklet for application rates for weed type and growth stage controlled by this product. Maximum in-crop application rate should be used when treating tough to control weeds, dense vegetative growth or weeds with a well-established root system.

Preplant, At-Planting, Preemergence

USE INSTRUCTIONS: This product may be used to control broadleaf weeds and may be applied before, during or immediately after planting Roundup Ready 2 Xtend® Soybeans. Refer to the “WEEDS CONTROLLED” section of the label booklet for XtendiMax™ With VaporGrip™ Technology for specific weeds controlled.

RESTRICTIONS: The maximum combined quantity of this product that may be applied for all preplant, at-planting, and preemergence applications is 44 fluid ounces (1.0 lb a.e. dicamba) per acre per season. The maximum application rate for a single, preplant, at-planting, or preemergence application must not exceed 44 fluid ounces (1.0 lb a.e. dicamba) per acre. Do not apply less than 22 fluid ounces (0.5 lb a.e. dicamba) per acre.

Postemergence (In-crop)

USE INSTRUCTIONS: This product may be used to control broadleaf weeds in Roundup Ready 2 Xtend® Soybeans. In-crop applications of this product can be made from emergence (cracking) up to and including beginning bloom (R1 growth stage of soybeans). Do not make in-crop applications of this product after beginning bloom (R1 growth stage of soybeans). The maximum and minimum rate for any single, in-crop application is 22 fluid ounces (0.5 lb a.e. dicamba) per acre. Using the appropriate application rate may reduce the selection for resistant weeds. For best performance, control weeds early when they are less than 4 inches. Monsanto Company does not warrant product performance of applications to labeled weeds greater than 4 inches in height.

A second application of this product up to the R1 crop growth stage may be necessary to control new flushes of weeds. Allow at least 7 days between applications. For best results, apply XtendiMax™ With VaporGrip™ Technology after some weed re-growth has occurred.

Application of this product postemergent and under stressful environments may cause temporary loss of turgor, a response commonly described as leaf droop in Roundup Ready 2 Xtend® Soybeans. Typically, affected plants recover in 1-3 days depending on the level of droop and environmental conditions.

RESTRICTIONS:

- The combined total application rate from crop emergence up to R1 must not exceed 44 fluid ounces (1.0 lb. a.e. dicamba) per acre.
- The maximum single, in-crop application rate must not exceed 22 fluid ounces (0.5 lb. a.e. dicamba) per acre.
- The combined total per year for all applications must not exceed 88 fluid ounces (2.0 lb. a.e. dicamba) per acre.
- Allow at least 7 days between final application and harvest or feeding of soybean forage.
- Allow at least 14 days between final application and harvest or feeding of soybean hay.

TANK-MIXING INSTRUCTIONS

~~XtendiMax™ With VaporGrip™ Technology may only be tank mixed with products that are listed at [INSERT URL HERE]. DO NOT tank mix any product with XtendiMax™ With VaporGrip™ Technology unless:~~

- ~~1. You check the list of products at [INSERT URL HERE] more than 7 days before applying XtendiMax™ With VaporGrip™ Technology; and~~
- ~~2. The intended tank-mix products are identified on that website; and~~
- ~~3. The intended products are not prohibited on either this supplemental label or the label of the tank mix product.~~
4. Additional Warnings and Restrictions:

- Some COC, HSOC and MSO adjuvants may cause a temporary crop response.
- Do not tank mix products containing ammonium salts such as ammonium sulfate and urea ammonium nitrate.
- Drift reduction agents (DRAs) can minimize the percentage of driftable fines. However, the applicator must check [INSERT URL] to determine if the DRA is listed and check with the DRA manufacturer to determine if the DRAs will work effectively with the approved spray nozzle, spray pressure, and the desired spray solution.

MONSANTO MAKES NO RECOMMENDATION OR WARRANTY HEREIN REGARDING THE USE OF ANY PRODUCT THAT MAY APPEAR ON THE WEBSITE REFERENCED ABOVE, REGARDLESS OF WHETHER SUCH PRODUCT IS USED ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. BUYER AND ALL USERS ARE SOLELY RESPONSIBLE FOR ANY LACK OF PERFORMANCE, LOSS, OR DAMAGE IN CONNECTION WITH THE USE OR HANDLING OF ANY SUCH PRODUCT ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. See the section titled "LIMIT OF WARRANTY AND LIABILITY" herein for more information.

WEED RESISTANCE MANAGEMENT


Some naturally occurring weed biotypes that are tolerant (resistant) to dicamba may exist due to genetic variability in a weed population. Where resistant biotypes exist, the repeated use of herbicides with the same sites of action can lead to the selection for resistant weeds. Certain agronomic practices can delay or reduce the likelihood that resistant weed populations will develop and can be utilized to manage weed resistance once it occurs.

Do not use less than 22 fluid ounces per acre (0.5 lb a.e./A) of this product in a single application. Using the appropriate application rate can minimize the selection for resistant weeds.

Proactively implementing diversified weed control strategies to minimize selection for weed populations resistant to one or more herbicides is a best practice. A diversified weed management program may include the use of multiple herbicides with different sites of action and overlapping weed spectrum with or without tillage operations and/or other cultural practices. Research has demonstrated that using the labeled rate and directions for use is important to delay the selection for resistance.

The continued effectiveness of this product depends on the successful management of the weed resistance program; therefore, it is very important to perform the following actions.

To aid in the prevention of developing weeds resistant to this product, the following steps should be followed where practical:

- Scout fields before application to ensure herbicides and rates will be appropriate for the weed species and weed sizes present.
- Apply full rates of XtendiMax™ With VaporGrip™ Technology for the most difficult to control weed in the field at the specified time (correct weed size) to minimize weed escapes.
- Scout fields after application to detect weed escapes or shifts in weed species.
- Report any incidence of non-performance of this product against a particular weed species to your Monsanto retailer, representative or call [INSERT PHONE NUMBER] 
- If resistance is suspected, treat weed escapes with an herbicide having a site of action other than Group 4 and/or use non-chemical methods to remove escapes, as practical, with the goal of preventing further seed production.

Additionally, users should follow as many of the following herbicide resistance management practices as is practical:

- Use a broad spectrum soil-applied herbicide with other sites of action as a foundation in a weed control program.
- Utilize sequential applications of herbicides with alternative sites of action.
- Rotate the use of this product with non-Group 4 herbicides.
- Incorporate non-chemical weed control practices, such as mechanical cultivation, crop rotation, cover crops and weed-free crop seeds, as part of an integrated weed control program.
- Thoroughly clean plant residues from equipment before leaving fields suspected to contain resistant weeds.
- Manage weeds in and around fields, during and after harvest to reduce weed seed production.

Contact the local agricultural extension service, Monsanto representative, agricultural retailer or crop consultant for further guidance on weed control practices as needed.

APPLICATION EQUIPMENT AND TECHNIQUES

DO NOT APPLY THIS PRODUCT TO ROUNDUP READY 2 XTEND® SOYBEANS USING AERIAL SPRAY EQUIPMENT.

Apply this product using properly maintained and calibrated equipment capable of delivering the desired volumes.

MANAGING OFF TARGET MOVEMENT

Do not allow herbicide solution to mist, drip, drift or splash onto desirable vegetation because severe injury or destruction to desirable broadleaf plants could result. The following off-target movement management requirements must be followed.



Controlling Droplet Size

Off-target movement potential may be reduced by applying large droplets that provide sufficient coverage and control. Applying larger droplets can reduce off-target movement potential, but will not prevent off-target movement if the application is made improperly, or under unfavorable environmental conditions (see the “**Wind Speed and Direction**”, “**Temperature and Humidity**” and “**Temperature Inversions**” sections of this label).

- **Nozzle type.** A list of approved nozzles may be found at [INSERT URL HERE]. Do not use any other nozzle and pressure combination not specifically listed on this website.
- **Hooded Sprayers.** Using a hooded sprayer in combination with approved nozzles may further reduce off-target movement potential.
- **Spray Volume.** Apply this product in a minimum of 10 gallons of spray solution per acre. Use a higher spray volume when treating dense vegetation. Higher spray volumes may also allow the use of larger nozzle orifices (sizes) which produce coarser spray droplets.
- **Equipment Ground Speed.** Select a ground speed that will deliver the desired spray volume while maintaining the desired spray pressure, but do not exceed a ground speed of 15 miles per hour. Slower speeds generally result in better spray coverage and deposition on the target area.
- **Spray boom Height.** Spray at the appropriate boom height based on nozzle selection and nozzle spacing, but do not exceed a boom height of 24 inches above target pest or crop canopy. Set boom to lowest effective height over the target pest or crop canopy based on equipment manufacturer's directions. Automated boom height controllers are recommended with large booms to better maintain optimum nozzle to canopy height. Excessive boom height will increase the potential for off-target movement.

Temperature and Humidity

When making applications in low relative humidity or temperatures above 91 degrees Fahrenheit, set up equipment to produce larger droplets to compensate for evaporation. Larger

droplets have a lower surface to volume ratio and can be impacted less by temperature and humidity. Droplet evaporation is most severe when conditions are both hot and dry.

Temperature Inversions

Do not apply this product during a temperature inversion. Off-target movement potential can be high during a temperature inversion.

- During a temperature inversion, the atmosphere is very stable and vertical air mixing is restricted, which can cause small, suspended droplets to remain in a concentrated cloud. This cloud can move in unpredictable directions due to the light variable winds common during inversions.
- Temperature inversions are characterized by increasing temperatures with altitude and are common on evenings and nights with limited cloud cover and light to no wind. Cooling of air at the earth's surface takes place and warmer air is trapped above it. They can begin to form as the sun sets and often continue into the morning.
- Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.
- The inversion will often dissipate with increased winds (above 3 mph) or at sunrise when the surface air begins to warm (generally 3°F from morning low).

Wind Speed and Direction

- Off-target movement potential is lowest between wind speeds of 3 to 10 miles per hour.
- Do not apply at wind speeds greater than 15 mph.
- For XtendiMax™ With VaporGrip™ Technology wind speed and direction restrictions see below table:

Wind speed	Application conditions and restrictions
<3 mph	Do not apply XtendiMax™ With VaporGrip™ Technology.
3-10 mph	Optimum application conditions for XtendiMax™ With VaporGrip™ Technology provided all other application requirements in this label are met.
>10 – 15 mph	Do not apply product when wind is blowing toward non-target sensitive crops.
> 15 mph	Do not apply XtendiMax™ With VaporGrip™ Technology.

NOTE: Local terrain can influence wind patterns. Every applicator must be familiar with local wind patterns and how they affect off-target movement.

PROTECTION OF SENSITIVE AREAS

Maintain a 110 foot downwind buffer (when applying 22 fluid ounces of this product per acre) or a 220 foot downwind buffer (when applying 44 fluid ounces of this product per acre) between the last treated row and the closest downwind edge (in the direction in which the wind is blowing) of any area less the distance of any of the adjacent areas specified below.

To maintain this required buffer zone:

- No application swath can be initiated in, or into an area that is within the applicable buffer distance.

The following areas may be included in the buffer distance calculation when adjacent to field edges:

- Roads, paved or gravel surfaces, and fallow.
- Planted agricultural fields containing: corn, dicamba tolerant cotton, dicamba tolerant soybean, sorghum, proso millet, small grains and sugarcane. ~~If the applicator intends to include such crops in the buffer distance calculation, the applicator must confirm such crops are present in the buffer distance prior to application.~~
- Agricultural fields that have been prepared for planting.
- Areas covered by the footprint of a building, silo, or other man made structure with walls and or roof.

Non-target Susceptible Crops

Failure to follow the requirements in this label could result in severe injury or destruction to desirable sensitive broadleaf crops and trees when contacting their roots, stems or foliage.

- Do not apply under circumstances where off-target movement may occur to food, forage, or other plantings that might be damaged or the crops thereof rendered unfit for sale, use or consumption.
- Do not allow contact of herbicide with foliage, green stems, exposed non-woody roots of crops, and desirable plants, including beans, cotton, flowers, fruit trees, grapes, ornamentals, peas, potato, soybean, sunflower, tobacco, tomato, and other broadleaf plants because severe injury or destruction may result, including plants in a greenhouse.
- Small amounts of dicamba that may not be visible may injure susceptible broadleaf plants.
- Applicators are required to ensure that they are aware of the proximity to non-target susceptible crops, and to avoid potential adverse effects from off-target movement of XtendiMax™ with VaporGrip™ Technology.

Before making an application, the applicator must survey the application site for neighboring non-target susceptible crops. The applicator must also consult sensitive crop registries to identify any commercial specialty or certified organic crops that may be located near the application site.

DO NOT APPLY this product when the wind is blowing toward adjacent commercially grown sensitive crops. Specifically, commercially grown tomatoes and other fruiting vegetables (EPA crop group 8), cucurbits (EPA crop group 9), and grapes are sensitive to dicamba.



Application Awareness

~~AVOIDING OFF-TARGET MOVEMENT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR~~

The interaction of equipment and weather related factors must be monitored to maximize performance and on-target spray deposition. The applicator is responsible for considering all of these factors when making a spray decision. The applicator is responsible for compliance with state and local pesticide regulations, including any state or local ~~regulation of off-target movement.~~

Proper spray system equipment cleanout

Minute quantities of dicamba may cause injury to non-dicamba-tolerant soybeans and other sensitive crops (see the “Non-target Susceptible Crops” section of this label for more information).

Clean equipment immediately after using this product using a triple rinse procedure as follows:

1. After spraying, drain the sprayer (including boom and lines) immediately. Do not allow the spray solution to remain in the spray boom lines overnight prior to flushing.
2. Flush tank, hoses, boom and nozzles with clean water.
3. Inspect and clean all strainers, screens and filters.
4. Prepare a cleaning solution with a commercial detergent or sprayer cleaner or ammonia according to the manufacturer's directions.
5. Take care to wash all parts of the tank, including the inside top surface. Start agitation in the sprayer and thoroughly recirculate the cleaning solution for at least 15 minutes. All visible deposits must be removed from the spraying system.
6. Flush hoses, spray lines and nozzles for at least 1 minute with the cleaning solution.
7. Repeat above steps for two additional times to accomplish an effective triple rinse.
8. Remove nozzles, screens and strainers and clean separately in the cleaning solution after completing the above procedures.
9. Appropriately dispose of rinsate from steps 1-7 in compliance with all applicable laws and regulations.
10. Drain sump, filter and lines.
11. Rinse the complete spraying system with clean water.

All rinse water must be disposed of in compliance with local, state, and federal requirements.

CROP ROTATIONAL RESTRICTIONS

No rotational cropping restrictions apply when rotating to Roundup Ready 2 Xtend® Soybeans or Bollgard II® XtendFlex® Cotton. For other crops the interval between application and planting rotational crop is given below. When counting days from the application of this product, do not count days when the ground is frozen. Planting at intervals less than specified below may result in crop injury. Moisture is essential for the degradation of this herbicide in soil. If dry weather prevails, use cultivation to allow herbicide contact with moist soil.

Planting/replanting restrictions for XtendiMax™ With VaporGrip™ Technology applications of 33 fluid ounces per acre or less

For corn, cotton (except Bollgard II® XtendFlex® Cotton), sorghum, and soybean (except Roundup Ready 2 Xtend® Soybeans), follow the planting restrictions in the directions for use for preplant application in **Section 10. Crop-Specific Information** of the label booklet. Do not plant barley, oat, wheat, and other grass seedings for 15 days for every 11 fluid ounces of this

product applied per acre east of the Mississippi River and 22 days for every 11 fluid ounces per acre applied west of the Mississippi River. No planting restrictions apply beyond 120 days after application of this product.

Planting/replanting restrictions for applications of more than 33 fluid ounces and up to 44 fluid ounces of XtendiMax™ With VaporGrip™ Technology per acre

Wait a minimum of 120 days after application of this product before planting corn, sorghum and cotton (except Bollgard II® XtendFlex® Cotton) east of the Rocky Mountains and before planting all other crops (except Roundup Ready 2 Xtend® Soybeans) grown in areas receiving 30 inches or more rainfall annually. Wait a minimum of 180 days before planting crops in areas with less than 30 inches of annual rainfall. Wait a minimum of 30 days for every 22 fluid ounces of this product applied per acre before planting barley, oat, wheat, and other grass seedings east of the Mississippi River and 45 days for every 22 fluid ounces of this product applied per acre west of the Mississippi River.

LIMIT OF WARRANTY AND LIABILITY

Monsanto Company ("Company") warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in this supplemental label ("Directions") when used in accordance with the Directions under the conditions described therein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NO OTHER EXPRESS WARRANTY OR IMPLIED WARRANTY OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY IS MADE. This warranty is also subject to the conditions and limitations stated herein. Specifically, and without limiting the foregoing, MONSANTO MAKES NO RECOMMENDATION OR WARRANTY HEREIN REGARDING THE USE OF ANY PRODUCTS THAT MAY APPEAR ON THE WEBSITE REFERENCED IN THE TANK-MIXING INSTRUCTIONS HEREIN, REGARDLESS OF WHETHER SUCH PRODUCT IS USED ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY. BUYER AND ALL USERS ARE SOLELY RESPONSIBLE FOR ANY LACK OF PERFORMANCE, LOSS, OR DAMAGE IN CONNECTION WITH THE USE OR HANDLING OF ANY SUCH PRODUCT ALONE OR IN A TANK MIX WITH XTENDIMAX™ WITH VAPORGRIP™ TECHNOLOGY.

Buyer and all users shall promptly notify this Company of any claims whether based in contract, negligence, strict liability, tort, or otherwise.

To the extent consistent with applicable law, buyer and all users are responsible for all loss or damage from use or handling which results from conditions beyond the control of this Company, including, but not limited to, incompatibility with products other than those expressly recommended by Company in the Directions, application to or contact with desirable vegetation, failure of this product to control weed biotypes which develop resistance to dicamba, unusual weather, weather conditions which are outside the range considered normal at the application site and for the time period when the product is applied, as well as weather conditions which are outside the application ranges set forth in the Directions, application in any manner not explicitly set forth in the Directions, moisture conditions outside the moisture range specified in the Directions, or the presence of products other than those expressly recommended by Company in the Directions in or on the soil, crop or treated vegetation.

This Company does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from this Company.

For in-crop (over-the-top) uses on crops within the Roundup Ready® Xtend™ Crop System, crop safety and weed control performance are not warranted by Company when this product is used in conjunction with "brown bag" or "bin run" seed saved from previous year's production and replanted.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE LIMIT OF THE LIABILITY OF THIS COMPANY OR ANY OTHER SELLER FOR

ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT (INCLUDING CLAIMS BASED IN CONTRACT, NEGLIGENCE, STRICT LIABILITY, OTHER TORT OR OTHERWISE) SHALL BE THE PURCHASE PRICE PAID BY THE USER OR BUYER FOR THE QUANTITY OF THIS PRODUCT INVOLVED, OR, AT THE ELECTION OF THIS COMPANY OR ANY OTHER SELLER, THE REPLACEMENT OF SUCH QUANTITY, OR, IF NOT ACQUIRED BY PURCHASE, REPLACEMENT OF SUCH QUANTITY. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, IN NO EVENT SHALL THIS COMPANY OR ANY OTHER SELLER BE LIABLE FOR ANY INCIDENTAL, CONSEQUENTIAL OR SPECIAL DAMAGES.

Upon opening and using this product, buyer and all users are deemed to have accepted the terms of this LIMIT OF WARRANTY AND LIABILITY which may not be varied by any verbal or written agreement.

These terms apply to this supplemental labeling and if these terms are not acceptable, return the product unopened at once.

©[YEAR]

MONSANTO COMPANY
800 N. LINDBERGH BLVD.
ST. LOUIS, MISSOURI 63167 USA

[INSERT DATE]

[INSERT PRINT PLATE NUMBER]

[INSERT SUPPLEMENTAL LABEL EXPIRATION DATE]

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 11/22/2016 7:05:32 PM
To: BHAKTA, TINA [AG/1000] [tina.bhakta@monsanto.com]
Subject: RE: Dicamba question

Tina,

It looks as though this should be alright. We are meeting to discuss next steps and will let you know as soon as we determine how to go about making the change.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: BHAKTA, TINA [AG/1000] [mailto:tina.bhakta@monsanto.com]
Sent: Monday, November 21, 2016 11:12 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba question

Hi Grant

We believe the Xtendimax testing protocol needs to bridge back to the Xtendimax (M1768) field deposition study which is contained in the submission below

- Submitted on November 19, 2015
 - MRID 49770301—Off-Target Field Deposition Study
 - MRID 49770302—AGDISP Modeling of Droplet Spectrum

From this the baseline for adding nozzles and tank mix partners through wind tunnel testing for Xtendimax should be bridging to nozzle ULD 12003 at 50 psi.

Since you are looking into this, the same will apply for when we talk about the label extension to Round up Xtend (M1769) which we made the submission below

- Submitted on April 12, 2016
 - MRID 49888606—Off-Target Field Deposition Study

From this the baseline for adding nozzles and tank mix partners through wind tunnel testing for Round Up Xtend should be TTI 11003 at 50 psi

We have drafted the appropriate parameters from each respective formulation specific field deposition study and attached to this email.

Please let me know if you need more

Tina Bhakta Ph.D.
Global Chemistry Expansion Lead, Regulatory

From: Rowland, Grant [<mailto:Rowland.Grant@epa.gov>]
Sent: Monday, November 21, 2016 9:42 AM
To: BHAKTA, TINA [AG/1000]
Subject: RE: Dicamba question

tina,

What specs does monsanto believe to be accurate for this and in what submitted data are they located?

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

From: Rowland, Grant
Sent: Wednesday, November 16, 2016 10:19 AM
To: 'BHAKTA, TINA [AG/1000]' <tina.bhakta@monsanto.com>
Subject: RE: Dicamba question

Tina,
Thank you. I have it here. I just wanted to make sure I was looking at the correct document in order to fully address your concerns.
I'll will be in touch.
-Grant

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

From: BHAKTA, TINA [AG/1000] [<mailto:tina.bhakta@monsanto.com>]
Sent: Wednesday, November 16, 2016 10:09 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: Re: Dicamba question

Hi grant

I am referring to

Appendix A
Testing of Tank Mix Products

The testing parameters that were listed in terms of nozzle and pressure.

Let me know if you need me to call or send to you.

Thanks

Tina

Sent from my iPhone

On Nov 16, 2016, at 8:57 AM, Rowland, Grant <Rowland.Grant@epa.gov> wrote:

Tina,

Which document are you referring to when you say the tank mix-protocol? The Final Decision that discusses Tank-mixing? The terms of registration? The Volatility document? Or are you referring to a document that was posted when the decision was proposed?

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

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Appointment

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 8/18/2016 1:00:16 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: FW: Meeting with BASF
Location: S12621

Start: 9/8/2016 1:00:00 PM
End: 9/8/2016 2:00:00 PM
Show Time As: Tentative

-----Original Appointment-----

From: Keigwin, Richard
Sent: Wednesday, August 17, 2016 6:16 PM
To: Keigwin, Richard; Rowland, Grant; Goodis, Michael; Kenny, Daniel; Montague, Kathryn V.; Cowles, James; Ada M Breaux; John J Arthur; Richard L Braddock
Subject: Meeting with BASF
When: Thursday, September 08, 2016 9:00 AM-10:00 AM (UTC-05:00) Eastern Time (US & Canada).
Where: S12621

Ada, John and Richard,

Please call (703) 305-7090 when you arrive, and someone will meet you in the lobby.

Meeting Background below:

From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Friday, August 05, 2016 3:19 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Cc: Ada M Breaux <ada.breaux@basf.com>; John J Arthur <john.arthur@basf.com>; Richard L Braddock <richard.braddock@basf.com>
Subject: Proposed meeting with BASF

Hello Grant,

Ada Breaux, has been speaking with Dan Kenny, and they agreed that it might be best if BASF could get together with a small group from EPA to talk through the pending DT use registration and Engenia herbicide. I can send a proposed agenda next week, but it would include a brief overview of what BASF has been doing to address concerns about dicamba volatility and potential synergy between dicamba and other herbicides. We would suggest that it may also be helpful to have an open discussion about the dicamba drift issues resulting from the illegal use of dicamba in DT crops this year, as well as the propose inadvertent dicamba residue tolerances. We would be happy to discuss any other issues or concerns that EPA is wrestling with over the proposed dicamba DT use decision.

Myself and two or three other individuals from BASF will participate in the meeting. In addition to yourself BASF would like to suggest that the following EPA individuals participate in the meeting:

Rick Keigwin
Mike Goodis
Dan Kenny
Kay Montague
Representatives from EFED

It would be great if we could find time to have the meeting within the next couple of weeks.

Please let me know if you have any questions, and thank you in advance to trying to setup this meeting.

Have a great weekend,

Jeff

Jeffrey H. Birk, Ph.D.
Product Registration Manager

Phone: 919-547-2622 Mobile: 919-225-9220 E-Mail: jeffrey.birk@basf.com
Postal Address: 26 Davis Drive, RTP, NC 27709

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Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 8/11/2016 8:27:38 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Proposed meeting with BASF

Jeff,
Yes, all the paper work went through. Your new PRIA date for the proposed dicamba inadvertent residue tolerances is **12/31/2016**.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Thursday, August 11, 2016 3:24 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Proposed meeting with BASF

Grant,

Thanks for the update on the proposed meeting.

Can you also confirm the new PRIA date (12/31/16) for the proposed dicamba inadvertent residue tolerances.

Thanks,

Jeff

Jeffrey H. Birk, Ph.D.
Product Registration Manager

Phone: 919-547-2622 Mobile: 919-225-9220 E-Mail: jeffrey.birk@basf.com
Postal Address: 26 Davis Drive, RTP, NC 27709

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From: Rowland, Grant [mailto:Rowland.Grant@epa.gov]
Sent: Thursday, August 11, 2016 2:56 PM
To: Jeffrey H Birk <jeffrey.birk@basf.com>
Subject: RE: Proposed meeting with BASF

Hi Jeff,

I just wanted to let you know I got your message and have been working with upper management to get this meeting scheduled. I'll let you know as soon as we have a time and date for you.

-Grant

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

From: Jeffrey H Birk [<mailto:jeffrey.birk@basf.com>]
Sent: Friday, August 05, 2016 3:19 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Cc: Ada M Breaux <ada.breaux@basf.com>; John J Arthur <john.arthur@basf.com>; Richard L Braddock <richard.braddock@basf.com>
Subject: Proposed meeting with BASF

Hello Grant,

Ada Breaux, has been speaking with Dan Kenny, and they agreed that it might be best if BASF could get together with a small group from EPA to talk through the pending DT use registration and Engenia herbicide. I can send a proposed agenda next week, but it would include a brief overview of what BASF has been doing to address concerns about dicamba volatility and potential synergy between dicamba and other herbicides. We would suggest that it may also be helpful to have an open discussion about the dicamba drift issues resulting from the illegal use of dicamba in DT crops this year, as well as the propose inadvertent dicamba residue tolerances. We would be happy to discuss any other issues or concerns that EPA is wrestling with over the proposed dicamba DT use decision.

Myself and two or three other individuals from BASF will participate in the meeting. In addition to yourself BASF would like to suggest that the following EPA individuals participate in the meeting:

Rick Keigwin
Mike Goodis
Dan Kenny
Kay Montague
Representatives from EFED

It would be great if we could find time to have the meeting within the next couple of weeks.

Please let me know if you have any questions, and thank you in advance to trying to setup this meeting.

Have a great weekend,

Jeff

Jeffrey H. Birk, Ph.D.
Product Registration Manager

Phone: 919-547-2622 Mobile: 919-225-9220 E-Mail: jeffrey.birk@basf.com
Postal Address: 26 Davis Drive, RTP, NC 27709

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Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 8/11/2016 6:55:31 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Proposed meeting with BASF

Hi Jeff,

I just wanted to let you know I got your message and have been working with upper management to get this meeting scheduled. I'll let you know as soon as we have a time and date for you.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

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Sent: Friday, August 05, 2016 3:19 PM
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Sent: 11/21/2016 3:41:30 PM
To: BHAKTA, TINA [AG/1000] [tina.bhakta@monsanto.com]
Subject: RE: Dicamba question

tina,

What specs does monsanto believe to be accurate for this and in what submitted data are they located?

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: Rowland, Grant
Sent: Wednesday, November 16, 2016 10:19 AM
To: 'BHAKTA, TINA [AG/1000]' <tina.bhakta@monsanto.com>
Subject: RE: Dicamba question

Tina,
Thank you. I have it here. I just wanted to make sure I was looking at the correct document in order to fully address your concerns.
I'll will be in touch.
-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: BHAKTA, TINA [AG/1000] [<mailto:tina.bhakta@monsanto.com>]
Sent: Wednesday, November 16, 2016 10:09 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: Re: Dicamba question

Hi grant

I am referring to

Appendix A
Testing of Tank Mix Products

The testing parameters that were listed in terms of nozzle and pressure.

Let me know if you need me to call or send to you.

Thanks

Tina

Sent from my iPhone

On Nov 16, 2016, at 8:57 AM, Rowland, Grant <Rowland.Grant@epa.gov> wrote:

Tina,

Which document are you referring to when you say the tank mix-protocol? The Final Decision that discusses Tank-mixing? The terms of registration? The Volatility document? Or are you referring to a document that was posted when the decision was proposed?

-Grant

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Sent: 11/18/2016 5:14:16 PM
To: BHAKTA, TINA [AG/1000] [tina.bhakta@monsanto.com]
Subject: RE: Dicamba question

Hi Tina.

We are still working on this one and should have a response for you by the end of the day Monday.

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: BHAKTA, TINA [AG/1000] [mailto:tina.bhakta@monsanto.com]
Sent: Friday, November 18, 2016 10:10 AM
To: BHAKTA, TINA [AG/1000] <tina.bhakta@monsanto.com>; Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba question

Hi Grant,

I was just checking in to see if you had been able to address this?

Thanks

Tina Bhakta Ph.D.
Global Chemistry Expansion Lead, Regulatory

From: BHAKTA, TINA [AG/1000]
Sent: Wednesday, November 16, 2016 9:57 AM
To: Rowland, Grant
Subject: Re: Dicamba question

Thanks Grant

Look forward to hearing from you. The new field deposition that we submitted to support registration of xtendimax had the following

MRID [49770301](#) which had XTENDIMAX: ULD 12003 at 50 psi

If that helps.

Thanks

Tina

Sent from my iPhone

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Sent: 11/16/2016 3:18:59 PM
To: BHAKTA, TINA [AG/1000] [tina.bhakta@monsanto.com]
Subject: RE: Dicamba question

Tina,
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Sent: 3/31/2016 4:46:12 PM
To: JENKINS, DANIEL J [AG/1920] [daniel.j.jenkins@monsanto.com]
Subject: Press release point of contact.

Hi Dan,
Your team can talk with Becky about the press release.

Becky Riggs
703-347-8572
Riggs.rebecca@EPA.gov

Thanks.

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: JENKINS, DANIEL J [AG/1920] [mailto:daniel.j.jenkins@monsanto.com]
Sent: Thursday, March 31, 2016 11:53 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Cc: BHAKTA, TINA [AG/1000] <tina.bhakta@monsanto.com>
Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

Grant:

Please see attached. Does EPA intend to make a press release?

Thank you,

Dan Jenkins
U.S. Agency Lead
Regulatory Affairs
Monsanto Company
1300 I St., NW
Suite 450 East
Washington, DC 20005
Office: 202-383-2851
Cell: 571-732-6575

From: Rowland, Grant [<mailto:Rowland.Grant@epa.gov>]

Sent: Thursday, March 31, 2016 11:31 AM

To: JENKINS, DANIEL J [AG/1920]

Cc: BHAKTA, TINA [AG/1000]

Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

Dan,

We have a little time left. Found one mistake. Can you make this quick change on page 7 of the soybean label under **Sensitive areas** to match the cotton label.

maintain the required buffer zone:

- No application swath can be initiated in, or into an area that is within the applicable buffer distance of ~~a sensitive area~~.
- The following areas may be included in the buffer distance calculation when adjacent to field edges:
 - Roads, paved or gravel surfaces.

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

From: JENKINS, DANIEL J [AG/1920] [<mailto:daniel.j.jenkins@monsanto.com>]

Sent: Thursday, March 31, 2016 10:03 AM

To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Rowland, Grant <Rowland.Grant@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>

Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

Dan:

Per our conversation. Please see attached. Note we had to revert to the [insert URL here] instead of the website address for tank mixes, bc it is not quite ready yet, but will be soon.

Thank you,

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From: Montague, Kathryn V. [mailto:Montague.Kathryn@epa.gov]
Sent: Thursday, March 31, 2016 8:49 AM
To: JENKINS, DANIEL J [AG/1920]; Rowland, Grant; Kenny, Daniel
Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

Hi, Dan,

We're looking into these, and will get back to you ASAP.

One question on the ag crops, though – how would the applicator know that adjacent cotton or soybeans are the tolerant versions?

Thanks,
Kay

From: JENKINS, DANIEL J [AG/1920] [mailto:daniel.j.jenkins@monsanto.com]
Sent: Thursday, March 31, 2016 8:02 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Subject: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

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110 ft buffer: *addition of "from" could be read to mean that you must have 110' between spray and field edge regardless of the "exceptions" (adjacent road, planted field any of the exceptions). That could result in 110' + the distance of any the excepted areas. Here is a proposed fix:*

"Maintain a 110 foot in-field buffer (when applying 16 fl oz of this product per acre), or a 220 foot in-field buffer (when applying 32 fl oz of this product per acre) on from all outer edges of the field, less the distance of any of the adjacent areas specified below."

Adjacent ag fields: *it doesn't make sense that non-broadleaves with registered uses can be included in the buffer distance calculation, but if a neighbor plants the exact same gm dicamba tolerant crops and it is adjacent it can't be. We strongly suggest the following:*

Planted agricultural fields containing crops with a natural tolerance to dicamba including corn, sorghum, proso millet, small grains and sugarcane and crops containing a dicamba tolerance gene including Roundup Ready II Xtend soybeans and Bollgard II Xtendflex Cotton.

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Sent: 3/31/2016 3:54:34 PM
To: JENKINS, DANIEL J [AG/1920] [daniel.j.jenkins@monsanto.com]
Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

Thanks. I will find out of the term of registration. And yes EPA does plan on making a press release. Does Monsanto have any plans for one?

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: JENKINS, DANIEL J [AG/1920] [mailto:daniel.j.jenkins@monsanto.com]
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Sent: Thursday, March 31, 2016 8:49 AM
To: JENKINS, DANIEL J [AG/1920]; Rowland, Grant; Kenny, Daniel
Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

Hi, Dan,

We're looking into these, and will get back to you ASAP.

One question on the ag crops, though -- how would the applicator know that adjacent cotton or soybeans are the tolerant versions?

Thanks,
Kay

From: JENKINS, DANIEL J [AG/1920] [mailto:daniel.j.jenkins@monsanto.com]
Sent: Thursday, March 31, 2016 8:02 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>; Montague, Kathryn V. <Montague.Kathryn@epa.gov>
Subject: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

We're cleaning things up, but please see our comments re

110 ft buffer: *addition of "from" could be read to mean that you must have 110' between spray and field edge regardless of the "exceptions" (adjacent road, planted field any of the exceptions). That could result in 110' + the distance of any the excepted areas. Here is a proposed fix:*

"Maintain a 110 foot in-field buffer (when applying 16 fl oz of this product per acre), or a 220 foot in-field buffer (when applying 32 fl oz of this product per acre) on from all outer edges of the field, less the distance of any of the adjacent areas specified below."

Adjacent ag fields: *it doesn't make sense that non-broadleaves with registered uses can be included in the buffer distance calculation, but if a neighbor plants the exact same gm dicamba tolerant crops and it is adjacent it can't be. We strongly suggest the following:*

Planted agricultural fields containing crops with a natural tolerance to dicamba including corn, sorghum, proso millet, small grains and sugarcane and crops containing a dicamba tolerance gene including Roundup Ready II Xtend soybeans and Bollgard II Xtendflex Cotton.

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Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 3/31/2016 2:06:25 PM
To: JENKINS, DANIEL J [AG/1920] [daniel.j.jenkins@monsanto.com]
Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

Dan,

Received.

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: JENKINS, DANIEL J [AG/1920] [mailto:daniel.j.jenkins@monsanto.com]
Sent: Thursday, March 31, 2016 10:03 AM
To: Montague, Kathryn V. <Montague.Kathryn@epa.gov>; Rowland, Grant <Rowland.Grant@epa.gov>; Kenny, Daniel <Kenny.Dan@epa.gov>
Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

Dan:

Per our conversation. Please see attached. Note we had to revert to the [insert URL here] instead of the website address for tank mixes, bc it is not quite ready yet, but will be soon.

Thank you,

Dan Jenkins
U.S. Agency Lead
Regulatory Affairs
Monsanto Company
1300 I St., NW
Suite 450 East
Washington, DC 20005
Office: 202-383-2851
Cell: 571-732-6575

From: Montague, Kathryn V. [mailto:Montague.Kathryn@epa.gov]
Sent: Thursday, March 31, 2016 8:49 AM
To: JENKINS, DANIEL J [AG/1920]; Rowland, Grant; Kenny, Daniel
Subject: RE: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

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Kay

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Sent: Thursday, March 31, 2016 8:02 AM

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Subject: Emailing - M1691 Herbicide DT soybean Label_March_29_2016_revisions_final epa edits 3 30 2016djj.pdf

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Message

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Sent: 8/3/2016 5:33:07 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Dicamba Inadvertent tolerance petition.

Jeff,

My apologies again, Dan and I are both being pulled into a last minute emergency meeting with the Office Director. It shouldn't last too long but if you do not hear from us by 1:50, would 3:00 work for the call?

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254*

From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Wednesday, August 03, 2016 12:59 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba Inadvertent tolerance petition.

Grant,

Yes that will work for me.

Thanks,

Jeff

Jeffrey H. Birk, Ph.D.
Product Registration Manager

Phone: 919-547-2622 Mobile: 919-225-9220 E-Mail: jeffrey.birk@basf.com
Postal Address: 26 Davis Drive, RTP, NC 27709

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From: Rowland, Grant [mailto:Rowland.Grant@epa.gov]
Sent: Wednesday, August 03, 2016 12:09 PM
To: Jeffrey H Birk <jeffrey.birk@basf.com>
Subject: RE: Dicamba Inadvertent tolerance petition.

Hi Jeff. Does 1:30 today work for you?

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

From: Jeffrey H Birk [<mailto:jeffrey.birk@basf.com>]
Sent: Tuesday, August 02, 2016 3:53 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba Inadvertent tolerance petition.

Grant,

Thanks, talk to you then.

Jeff

Sent from my Windows Phone

From: Rowland, Grant
Sent: 8/2/2016 3:42 PM
To: Jeffrey H Birk
Subject: RE: Dicamba Inadvertent tolerance petition.

Jeff,
I couldn't free Dan up from 1-2 today, so we will give you a call tomorrow morning.

-Grant

Grant Rowland
Herbicide Branch
Registration Division
Office of Pesticide Programs
703-347-0254

From: Jeffrey H Birk [<mailto:jeffrey.birk@basf.com>]
Sent: Tuesday, August 02, 2016 10:50 AM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba Inadvertent tolerance petition.

Hello Grant,

Good to hear from you. I never received the PRIA date, so I had no idea that it is tomorrow. I am available between now and 11:30 and from 1:00 to 2:00 today. Otherwise we can discuss tomorrow morning.

Thanks,

Jeff

Jeffrey H. Birk, Ph.D.
Product Registration Manager

Phone: 919-547-2622 Mobile: 919-225-9220 E-Mail: jeffrey.birk@basf.com
Postal Address: 26 Davis Drive, RTP, NC 27709

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From: Rowland, Grant [<mailto:Rowland.Grant@epa.gov>]

Sent: Tuesday, August 02, 2016 10:10 AM

To: Jeffrey H Birk <jeffrey.birk@basf.com>

Subject: Dicamba Inadvertent tolerance petition.

Hi Jeff,

I wanted to touch bases with you regarding the inadvertent tolerance petition BASF has submitted for Dicamba(5F8378). The PRIA date for this action is tomorrow and as you know the intricacies of this one and Dicamba as a whole has led to some unforeseen delays.

Are you available sometime today to have a phone call with Dan Kenny and myself to discuss renegotiating the PRIA date for this action. We would also be happy to try and answer any other questions you may have regarding the Tolerance action at that time. Thanks Jeff

-Grant

*Grant Rowland
Herbicide Branch
Registration Division
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703-347-0254*

Message

From: Rowland, Grant [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=5B004BC79F1F40B0A181A584A8C64495-ROWLAND, GRANT]
Sent: 8/3/2016 4:09:10 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Dicamba Inadvertent tolerance petition.

Hi Jeff. Does 1:30 today work for you?

*Grant Rowland
Herbicide Branch
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703-347-0254*

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Sent: Tuesday, August 02, 2016 3:53 PM
To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba Inadvertent tolerance petition.

Grant,

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Sent from my Windows Phone

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Subject: RE: Dicamba Inadvertent tolerance petition.

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From: Jeffrey H Birk [mailto:jeffrey.birk@basf.com]
Sent: Tuesday, August 02, 2016 10:50 AM

To: Rowland, Grant <Rowland.Grant@epa.gov>
Subject: RE: Dicamba Inadvertent tolerance petition.

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Product Registration Manager

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Sent: 8/2/2016 7:42:40 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: RE: Dicamba Inadvertent tolerance petition.

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Herbicide Branch
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Sent: 8/2/2016 2:09:38 PM
To: Jeffrey H Birk [jeffrey.birk@basf.com]
Subject: Dicamba Inadvertent tolerance petition.

Hi Jeff,

I wanted to touch bases with you regarding the inadvertent tolerance petition BASF has submitted for Dicamba(5F8378). The PRIA date for this action is tomorrow and as you know the intricacies of this one and Dicamba as a whole has led to some unforeseen delays.

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